

EPA Registration No.
85353-3 vol. 1



Technology Sciences Group Inc.

1150 18th Street, Suite 1000
Washington, DC 20036
Direct: (202) 828-8967
Fax: (202) 872-0745
E-Mail: MReynolds@TSGUSA.com

Micah T. Reynolds
Senior Regulatory Consultant

October 27, 2016

Global Brass and Copper, Inc.
Fast-Track Label Amendment for
CuVerro® III; EPA Reg. No. 85353-3

Mr. Eric Miederhoff, PM-31
Antimicrobials Division (7510P)
Office of Pesticide Programs (AMEND)
U.S. Environmental Protection Agency
Document Processing Center
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202

Dear Mr. Miederhoff:

Technology Sciences Group Inc., on behalf of Global Brass and Copper, Inc., is submitting the enclosed fast-track label amendment to: 1) update non-food use sites (products from which the product may be fabricated) consistent with previous updates made by the Copper Development Association's parent product (EPA Reg. No. 82012-3) as well as expansion to add other nonfood use sites; 2) add several optional marketing logos; and 3) update the company headquarters information consistent with a previous company address update submitted to OPP. Please find enclosed the following documentation in support of this amendment:

- 1) EPA Application for Amendment (EPA Form 8570-1);
- 2) One (1) copy of the proposed product label with changes marked in redline or highlight;
- 3) One (1) clean copy of the proposed revised product label.

At the time of label review, I am happy to provide electronic versions of the redline/highlighted and clean labels in order to expedite review. If you have any questions or require additional information or clarification, please do not hesitate to contact me by phone at (202) 828-8967 or by e-mail at mreynolds@tsgusa.com.

Sincerely,

Regulatory Consultant to
Global Brass and Copper, Inc.


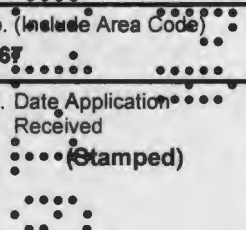
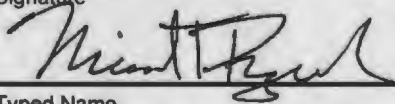
Enclosures

CC: J. Miller, A. Woody (Global Brass and Copper, Inc.)

Washington, D.C.
1150 18th St., NW, Suite 1000
Washington, D.C. 20036
Phone: (202) 223-4392

California
712 Fifth St., Suite A
Davis, CA 95616
Phone: (530) 757-1245

Canada
275 Slater St., Suite 900
Ottawa, Ontario K1P 5H9
Phone: (613) 247-6285

	United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input checked="" type="checkbox"/> Amendment <input type="checkbox"/> Other	OPP Identifier Number
Application for Pesticide – Section I			
1. Company/Product Number <div style="text-align: right;">85353-3</div>		2. EPA Product Manager <div style="text-align: right;">Eric Miederhoff</div>	
4. Company/Product (Name) CuVerro® III		3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted	
5. Name And Address Of Applicant (Include ZIP Code) Global Brass and Copper, Inc. 305 Lewis and Clark Boulevard East Alton, Illinois 62024 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	
Section II			
<input checked="" type="checkbox"/> Amendment – Explain below. <input type="checkbox"/> Final Printed labels in response to Agency letter dated _____ <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Notification – Explain below. <input type="checkbox"/> Other – Explain Below.			
Explanation: Use additional page(s) if necessary. (For section I and Section II.) Submission of Fast-Track Label Amendment to expand additional nonfood use sites (both new and others consistent with parent product), add marketing logos, and update company headquarters address information. Please confirm receipt with Micah Reynolds: mreynolds@tsgusa.com , phone (202) 828-8967, or fax (202) 872-0745.			
Section III			
1. Material This Product Will Be Packaged In:			
Child Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No <i>* Certification must be submitted</i>	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. Container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. Container	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input checked="" type="checkbox"/> Other (Specify) <u>none</u>
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(S) Retail Container N/A – no container	
5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product		6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithographed <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input checked="" type="checkbox"/> Other <u>Attached to Bill of Lading</u>	
Section IV			
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)			
Name Micah T. Reynolds, Technology Sciences Group, Inc.		Title Senior Regulatory Consultant	
		Telephone No. (Include Area Code) (202) 828-8967	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamp) <div style="text-align: center;">  </div>
2. Signature 		3. Title Regulatory Consultant to Global Brass and Copper, Inc.	
4. Typed Name Micah T. Reynolds		5. Date October 27, 2016	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



Office of Pesticide Programs

Michael T. Reynolds
305 Lewis & Clark Boulevard
East Alton, Illinois 62024

AUG 08 2014

Subject: **CuVerro® III**
EPA Registration No: 85353-3
Application Date: June 12, 2014
Receipt Date: June 13, 2014

Dear Mr. Reynolds:

The following Amendment, submitted under section 3 (c) (7) (A) of Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), is acceptable.

- To update production site addresses

Based on a review of the submitted material, Basic Confidential Statements of Formula (CSF) dated June 12, 2014, is acceptable and supersedes all previous CSF's. This information has been added to your files.

If you have any questions concerning this letter, please contact Zebora Johnson at (703) 308-7080.

Sincerely

A handwritten signature in black ink, appearing to read "Eric Miederhoff". The signature is written in a cursive, flowing style.

Eric Miederhoff
Acting Product Manager (33)
Regulatory Management Branch I
Antimicrobial's Division (7510P)

Receipt for Section 3

S: 953588

Milestone Email:

Regulatory Type: Product Registration - Section 3

Resubmission: ☐ Yes ☒ No

Application Type: Notification

Fee For Service: ☐ Yes ☒ No

Print Letter

Enter More Information

Tracking

Company: 85353 GLOBAL BRASS AND COPPER INC

Risk Manager: Antimicrobials Division, Risk Management Team 33

Product #: 85353-3 Product Name: CUPERRO III

Override#:

Me Too Section3: 82012-3

Me Too Product Name: ANTIMICROBIAL COPPER ALLOYS - GROUP I

Application Date: 12-Jun-2014

OPP Rec'd Date: 13-Jun-2014

Front End Date: 13-Jun-2014

Risk Manager Send Date: 13-Jun-2014

FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

CSF NOTIFICATION

New Ingredient

Request Date

New Ingredient

Received Date

Form A: ☐

Signature Date:

Form B: ☐

Signature Date:

Receipt Content

Des

CSF

View/Edit



Technology Sciences Group Inc.

1150 18th Street, Suite 1000
Washington, DC 20036
Direct: (202) 828-8967
Fax: (202) 872-0745
E-Mail: MReynolds@TSGUSA.com

Micah T. Reynolds
Senior Regulatory Consultant

CONTAINS CONFIDENTIAL BUSINESS INFORMATION

June 12, 2014

Global Brass and Copper, Inc.
CSF Notification Submission for
CuVerro® III; EPA Reg. No. 85353-3

Mr. Seiichi Murasaki, Acting PM-33
Antimicrobials Division (7510P)
Office of Pesticide Programs (NOTIF)
U.S. Environmental Protection Agency
Document Processing Center
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202

Dear Mr. Murasaki:

Technology Sciences Group, Inc., on behalf of Global Brass and Copper, Inc., is submitting the enclosed CSF notification for the above-referenced product. The registrant is updating production site addresses, as several have changed due to local municipality street name changes, and updating sources of alloy elements (inert ingredients). No changes to the main CSF pages are being made; only changes to the attachment pages for production sites and sources of copper materials and alloy elements. Please find enclosed the following documents supporting this submission:

- 1) EPA Notification Form (EPA Form 8570-1);
- 2) Current Confidential Statement of Formula, version dated December 31, 2012 (1 copy);
- 3) Proposed Revised Confidential Statement of Formula (2 copies).

If you have any questions or require additional information or clarification, please do not hesitate to contact me by phone at (202) 828-8967 or by e-mail at mreynolds@tsgusa.com.

Sincerely,

Regulatory Consultant to
Global Brass and Copper, Inc.


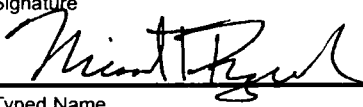
Enclosures

CC: M. Visnack (Global Brass and Copper, Inc.)

Washington, D.C.
1150 18th St., NW, Suite 1000
Washington, D.C. 20036
Phone: (202) 223-4392

California
712 Fifth St., Suite A
Davis, CA 95616
Phone: (530) 757-1245

Canada
275 Slater St., Suite 900
Ottawa, Ontario K1P 5H9
Phone: (613) 247-6285

	United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
Application for Pesticide – Section I			
1. Company/Product Number 85353-3		2. EPA Product Manager Seiichi Murasaki	
4. Company/Product (Name) CuVerro® III		3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted	
5. Name And Address Of Applicant (Include ZIP Code) Global Brass and Copper, Inc. 305 Lewis & Clark Boulevard East Alton, Illinois 62024 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	
Section II			
<input type="checkbox"/> Amendment – Explain below. <input type="checkbox"/> Final Printed labels in response to Agency letter dated _____ <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input checked="" type="checkbox"/> Notification – Explain below. <input type="checkbox"/> Other – Explain Below.			
Explanation: Use additional page(s) if necessary. (For section I and Section II.) Submission of CSF Notification to revise production site address information and add sources of inert ingredients as per PR Notice 98-10. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA. Please confirm receipt with Micah Reynolds: mreynolds@tsqusa.com, phone (202) 828-8967, or fax (202) 872-0745.			
Section III			
1. Material This Product Will Be Packaged In:			
Child Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No * Certification must be submitted	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. Container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. Container	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input checked="" type="checkbox"/> Other (Specify) <u>none</u>
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(S) Retail Container N/A – no container	
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1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Micah T. Reynolds, Technology Sciences Group, Inc.		Title Senior Regulatory Consultant	
		Telephone No. (Include Area Code) (202) 828-8967	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title Regulatory Consultant to Global Brass and Copper, Inc.	
4. Typed Name Micah T. Reynolds		5. Date June 12, 2014	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



United States
Environmental Protection
Agency

Office of Pesticide Programs

Global Brass and Copper, Inc.
4217 North Shamrock Street
East Alton, Illinois
62024

JUL 12 2013

Attention: Mr. Reynolds

Subject: CuVerro ® III
EPA Registration No: 85353-3
Notification Dated: February 13, 2012

This will acknowledge receipt of your notification, submitted under the provisions of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) Section 3(c) (9).

Proposed Notification

- To add optional label verbiage related to packaging

General Comments

Base on a review of the submitted material, the following comments apply:

The Notification dated May 14, 2013, to add optional label verbiage and logo to consistent with alternate brand name is acceptable and is in compliance with PR Notice 98-10. This information has been added to your file.

If you have any questions concerning this letter, please contact Zebora Johnson at (703) 308-7080.

Sincerely

A handwritten signature in cursive script, appearing to read "M. Swindell".

Marshall Swindell
Product Manger (33)
Regulatory Management Branch I
Antimicrobial's Division (7501P)

[Alternate Brand Name: CuVerro® III Antimicrobial Copper Alloy]
CuVerro® III Bactericidal Copper Surfaces]

**CuVerro® III
AND ASSOCIATED FABRICATED PRODUCTS
MASTER LABEL**

The Master Label consists of the label that will accompany the CuVerro® III Antimicrobial Alloys and a label that will accompany each product fabricated using a registered CuVerro® III alloy.

[Alloy Label – Front Panel]

**CuVerro® III
AND ASSOCIATED FABRICATED PRODUCTS**

Active Ingredient:

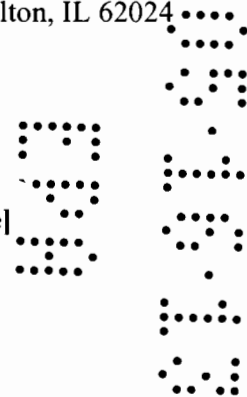
Copper	82.6%
Other	17.4%
Total	100%

EPA Registration No. 85353-3
EPA Establishment No. 85353-XX

Made in the United States by:
Global Brass and Copper, Inc.
427 N. Shamrock Street
East Alton, IL 62024

Net Weight: XXX lbs XXX ounces of CuVerro® III

[See insert (side panel) (back panel) for Directions for Use]



DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

CuVerro® III Antimicrobial Copper Alloys

This alloy is only intended for the manufacture and fabrication of touch surface components for use in hospitals, healthcare facilities, laboratories, and various public, commercial, and residential buildings. [The claims listed on the attached fabricated product label may be made in connection with the marketing and sale of CuVerro® III Antimicrobial Copper Alloys and fabricated products made from CuVerro® III Antimicrobial Copper Alloys under EPA Registration Number 85353-3.]

A list of components that may be fabricated out of CuVerro® III Antimicrobial Copper Alloys is specified below. CuVerro® III Antimicrobial Copper Alloys are not approved for direct food contact or food packaging uses.

Touch Surface Components

Healthcare Facilities

- Bedrails, footboards
- Over-bed tables
- Bed-side tables in hospitals, extended care facilities, senior housing etc. (knobs, pulls, handles; surfaces)
- Handrails, (corridor/hallways) (Senior housing), automatic door push plates
- Stair rails, handrails, tubular railing, and supports, rail fittings T's, elbows and brackets
- Bedrails, assistance rails,
- Toilet safety rails
- Carts
 - Hospital carts (table surfaces, handles, legs)
 - Computer carts
 - Record carts
 - Phlebotomy carts
 - Other Carts (tables/surfaces, shelving, railings, handles, pulls)
- Equipment carts (horizontal surfaces, frames, handles)
- Door push plates, kick plates, mop plates, stretcher plates
- Sinks: spigots, drains, sinks themselves
- Faucet: handles, spigot, drain control lever
- Water fountains: bubbler head, drain strainer, handle
- Alcohol sanitizer dispenser, handle
- Paper towel holders, facial tissue holders, toilet paper holders
- Air hand dryer, controls and push buttons on air hand dryers
- Hydrotherapy tanks (whirlpool tanks): shells, covers, headrests, ~~chair~~ fittings
- Door handles, doorknobs (outer touch surfaces)
- Grab bars in bathrooms showers and bathtubs
- Panic bars on emergency room doors

- Towel bars
- Showerheads
- Countertops and tabletops (non-food use only)
- Hinges, locks, latches, and trim
- Door stops, door pulls, and protector guards
- Toilet and urinal hardware, levers, push buttons
- Toilet seat inlay for lifting of seat
- Closures
- Vertical locking arms
- Vertical cover guards
- Protection bars
- Light switches, switch plates
- Visitor chairs: armrests, metal frames
- Thermostat covers, control knobs and wheels
- Telephone handsets and surfaces (housings), keypad
- Kitchen surfaces (non-food contact only): table tops, counter tops, handles (microwave, refrigerator, stove), cabinet doors, cabinet hinges, pulls, backsplash, hoods, control knobs (appliances, fans)
- Floor tiles
- Ceiling tiles (non-porous)
- Wall tiles
- Instrument handles

Medical equipment knobs, pulls and handles for:

- Drug delivery systems
- Monitoring systems
- Hospital beds
- Office equipment
- Operating room equipment
- Stands and fixtures

Types of knobs: *e.g.*, Prong, fluted, knurled, push/pull, T-handle, tapered, and ball knobs

- Intravenous (IV) poles, bases, hangers, clips
- Trays (instruments, non-food contact)
- Pans (bed)
- Walkers, wheelchair handles, and tubular components
- Computer keyboards: keys, housings, computer mouse surfaces
- Exercise and rehabilitation equipment, handles, bars
- Physical therapy equipment: physical therapy tables, treatment chairs and portable taping tables
- Chairs (shower chairs, patient chairs, visitor chairs): rails, backs, legs, seats
- Lighting products: X-ray illuminators, operating rooms, patient examination rooms, surgical suites, and reading lamps for hospital rooms and assisted living facilities etc. Components can include bases, arms, housings, handles, hinges
- Headwall systems: the unit themselves, outlet covers, knobs and dials, lighting units (lamp housings and adjustable arms), CRT monitors with rotating knobs and levers and adjustments. Baskets, monitor housings, knobs, baskets, tables, IV poles

- Critical care cart: Table top, drawer, drawer pull, lock, copper wire baskets for storage of equipment and charts.
- Bedside lavatory: sink, faucet, handles, drawer pulls, toilet seat, toilet seat cover, toilet handle, door and cabinet facings, counter tops
- Medical records: Chart holders, clipboards, filing systems
- Storage Shelving: wire shelving etc. for medical supplies
- Grab handles on privacy curtains
- Lids of laundry hampers, trash canisters, and other containers
- Bedside pitchers
- Closet rods and hangers
- Television controls: knobs, buttons, remote
- Monitor (television, computer, etc.) housing
- Cup Holder
- Toothbrush holder
- Soap holder, dispenser
- Magazine rack
- Signage
- Coat rack and hooks
- Shower curtain rings
- Radiator cover
- Bracelets
- Pens
- Badge clips
- Name tags
- Patient gown snaps
- Window sills, pulls and locks
- Electrical wallplates

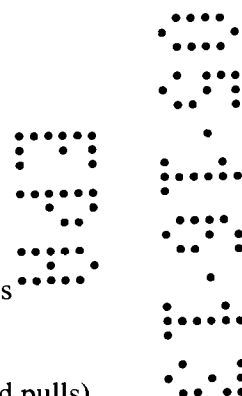
Community Facilities (including various public and commercial buildings)

- Shopping cart handles, child seats, handrails
- Cash registers: housing, keypads
- ATM machines: keys, housing
- Gym/Health club lockers, locker handles, locker shelving, trainers' tables,
- Exercise equipment, handles, bars
- Ice and water dispensers (outer surfaces without water contact)
- Elevator: handrail, control panel, buttons, interior walls, floor tiles, exterior call button plate
- Paper towel dispensers. Housing itself, (turn) handle, (push) handle
- Soap holder
- Soap dispenser (wall mounted): push bar and dispenser itself
- Soap dispenser (sitting on counter): dispenser housing itself, push mechanism
- Toilet paper dispenser (housing)
- Windows (crank), Locking mechanism, pull handles
- Window treatments (cord pulls), Venetian blinds (wands, cord pulls)
- Jalousie Windows (crank)
- Casement (cranks, levers, hinges)
- Single and double-hung windows (locks and pulls)

- Light switches, switch plates
- Lids of laundry hampers, trash canisters, and other containers
- Magazine rack
- Signage
- Coat rack and hooks
- Shower curtain rings
- Radiator cover
- Bracelets
- Badge clips
- Name tags
- Vending machines (non-food contact only)
- Window sills
- Electrical wallplates
- Clip boards
- Office supplies: paper clips, staplers, tape dispensers

Residential Buildings (including homes, apartments, apartment buildings and other residences)

- Kitchen surfaces (non-food contact only): table tops, counter tops, handles (microwave, refrigerator, stove), cabinet doors, cabinet hinges, pulls, backsplash, hoods, control knobs (appliances, fans)
- Bedrails, footboards
- Handrails
- Stair rails
- Door push plates
- Sinks: spigots, drains, sinks themselves
- Faucet: handles, spigot, drain control lever
- Paper towel holders, facial tissue holders, toilet paper holders
- Door handles, doorknobs (outer touch surfaces)
- Grab bars in bathrooms showers and bathtubs
- Towel bars
- Showerheads
- Countertops and tabletops
- Hinges, locks, latches, and trim
- Door stops, door pulls, and protector guards
- Toilet and urinal hardware, levers, push buttons
- Toilet seat inlay for lifting of seat
- Light switches, switch plates
- Thermostat covers, control knobs and wheels
- Telephone handsets and surfaces (housings), keypad
- Floor tiles
- Ceiling tiles (non-porous)
- Wall tiles
- Computer keyboards: keys, housings, computer mouse surfaces
- Exercise equipment, handles, bars
- Windows (crank), Locking mechanism, pull handles
- Window treatments (cord pulls), Venetian blinds (wands, cord pulls)



- Jalousie Windows (crank)
- Casement (cranks, levers, hinges)
- Single and double-hung windows (locks and pulls)
- Television control knobs and buttons
- Lids of laundry hampers, trash canisters, and other containers
- Bedside pitchers
- Closet rods and hangers
- Television remote
- Cup Holder
- Toothbrush holder
- Soap holder, dispenser
- Magazine rack
- Coat rack and hooks
- Shower curtain rings
- Radiator cover
- Window sills
- Electrical wallplates
- Baby cribs: rails, fittings, brackets, supports
- Bowl stands
- Office supplies: paper clips, staplers, tape dispensers
- Monitor (television, computer, etc.) housing

Mass Transit Facilities

- Handrails
- Stair rails, tubular railing, and supports; elbows and brackets
- Door push plates, kick plates
- Door handles, door knobs (outer touch surfaces)
- Grab bars and handles
- Tiles: wall, floor, ceiling (non-porous)
- Chairs and benches: rails, backs, legs, seats
- Window sills, pulls, and handles
- Signage
- Vending machines (non-food contact only)

Laboratories

- Incubator interior and outside surfaces, including culture chambers, walls, shelving and support brackets, handles, circulating fan assemblies, pan
- Laboratory surfaces: table tops, counter tops, handles, cabinet doors, cabinet hinges, pulls, backsplash, hoods, control knobs
- Laboratory carts, trays, and pans
- Door handles, knobs, latches and locks
- Laboratory equipment: safety cabinets, enclosures, vent hoods

Other

- Play area equipment (indoor only): bars, handles, chains, push plates, handrails, stair rails and risers, wheels, knobs, flooring
- Chapel pews

- Eye glass frames and protective eye wear
- Pens
- Combs
- Ashtrays

Do not wax, paint, lacquer, varnish, or otherwise coat touch surfaces.

CuVerro® III – Fabricated Products

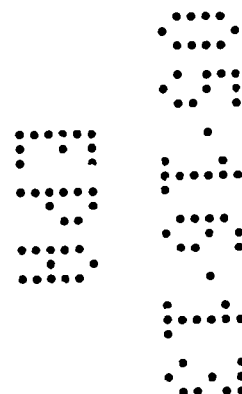
The CuVerro® III fabricated products listed above may be sold and distributed under EPA Registration Number 85353-3. Products fabricated with CuVerro® III Antimicrobial Copper Alloys must bear the EPA approved fabricated product label, below, with one or more of the listed claims.

STORAGE AND DISPOSAL

Dispose of excess by recycling.

WARRANTY STATEMENT

| If used as intended, this product is wear-resistant and the durable antibacterial (bactericidal) properties will remain effective for as long as the product remains in place and is used as directed.



CuVerro® III

Fabricated Product Label

FRONT

[This (touch surface) (product)] made from
CuVerro® III
Active Ingredient:
Copper82.6%
Other.....17.4%
[Total 100.0%]
See [Back/Side Panel][Insert] for Directions for
Use
Net Weight: XXX lbs XXX ounces of CuVerro®
III

BACK

CuVerro® III

Laboratory testing has shown that when cleaned regularly this surface:

- Continuously reduces bacterial* contamination, achieving 99.9% reduction within 2 hours of exposure.
- Kills greater than 99.9% of Gram-negative and Gram-positive bacteria* within 2 hours of exposure.
- Delivers continuous and ongoing antibacterial* (bactericidal*) action, remaining effective in killing greater than 99.9% of bacteria* within 2 hours.
- Kills greater than 99.9% of bacteria* within two hours and continues to kill 99% of bacteria* even after repeated contaminations.
- Helps inhibit the buildup and growth of bacteria* within 2 hours of exposure between routine cleaning and sanitizing steps.
- [This product/component name] is made (out of)(from) a (copper)(touch) surface that continuously kills bacteria left behind [by dirty hands][on the surface] killing more than 99.9% of bacteria* within 2 hours.

* *Staphylococcus aureus*, *Enterobacter aerogenes*, Methicillin-Resistant *Staphylococcus aureus* (MRSA), *Escherichia coli* O157:H7, *Pseudomonas aeruginosa* and, Vancomycin – Resistant *Enterococcus faecalis* (VRE).

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Proper Care and Use. Clean and sanitize according to standard practice. Healthcare facilities must maintain the product in accordance with infection control guidelines. The use of this surface is a supplement to and not a substitute for standard infection control practices; users must continue to follow all current infection control practices, including those practices related to cleaning and disinfection of environmental surfaces. This surface has been shown to reduce microbial contamination, but does not necessarily prevent cross contamination.

This surface may be subject to recontamination and the level of active bacteria at any time will depend on the frequency and timing of recontamination and cleanliness of the surface (among other factors). In order to have proper antimicrobial effect, this product must be cleaned and maintained according to the directions for use.

Do not wax, paint, lacquer, varnish, or otherwise coat this product.

Routine cleaning to remove dirt and filth is necessary for good sanitation and to assure the effective antibacterial (bactericidal) performance of this surface. Cleaning agents typically used for traditional hard, non-porous touch surfaces are permissible. The appropriate cleaning agent depends on the type of soiling and the measure of sanitization required. Normal tarnishing or wear of this surface will not impair antibacterial (bactericidal) effectiveness.

Not approved for direct food contact or food packaging uses.

[Items exposed to outdoor environmental conditions are not representative of indoor laboratory test conditions, and, therefore, may impart reduced efficacy if not cleaned when visibly soiled.]

STORAGE AND DISPOSAL

Dispose of by recycling or put in trash.

WARRANTY STATEMENT

If used as intended, this product is wear-resistant and the durable antibacterial (bactericidal) properties will remain effective for as long as the product remains in place and is used as directed.

EPA Reg. No. 85353-3

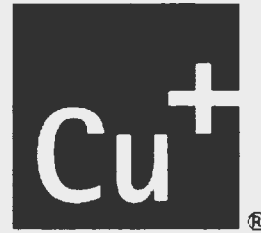
EPA Est. No. [Product Manufacturer Number]-85353-XX

Manufactured by: [Product Manufacturer Company Name and Address]

Global Brass and Copper, Inc. 427 North Shamrock Street East Alton, IL 62024

[Optional Logos for Use with Alloy Label or Fabricated Product Label]

Antimicrobial
Copper



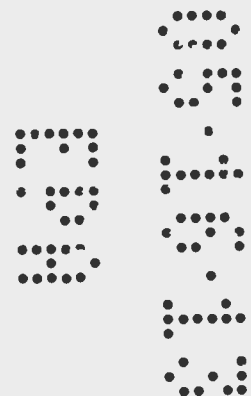
CuVerro[®]

CuVerro[®]

Bactericidal Copper Surfaces

CuVerro[®]

Antimicrobial Copper Surfaces





Technology Sciences Group Inc.

1150 18th Street, Suite 1000
Washington, DC 20036
Direct: (202) 828-8967
Fax: (202) 872-0745
E-Mail: MReynolds@TSGUSA.com

Micah T. Reynolds

Senior Regulatory Consultant

May 14, 2013

**Global Brass and Copper, Inc.
Label Notification for CuVerro® III;
EPA Reg. No. 85353-3**

Mr. Marshall Swindell, PM-33
Antimicrobials Division (7510P)
Office of Pesticide Programs (NOTIF)
U.S. Environmental Protection Agency
Document Processing Center
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202

Dear Mr. Swindell:

Technology Sciences Group, Inc., on behalf of Global Brass and Copper, Inc., is submitting the enclosed label notification to: 1) update the non-food use sites (products from which the product may be fabricated) consistent with the same recent updates made by the Copper Development Association's parent product (82012-3); 2) add alternate verbiage (i.e. "bactericidal") to select antimicrobial claims that are consistent with the original claim; and 3) add a logo consistent with a previously approved alternate brand name. Please find enclosed the following documents supporting this notification:

- 1) Application for Notification (EPA Form 8570-1);
- 2) One (1) copy of the label with changes highlighted;
- 3) Three (3) copies of revised product labeling.

If you have any questions or require additional information or clarification, please do not hesitate to contact me by phone at (202) 828-8967 or by e-mail at mreynolds@tsgusa.com.

Sincerely,

Regulatory Consultant to
Global Brass and Copper, Inc.


Enclosures

CC: M. Visnack (Global Brass and Copper, Inc.)

Washington, D.C.
1150 18th St., NW, Suite 1000
Washington, D.C. 20036
Phone: (202) 223-4392

California
712 Fifth St., Suite A
Davis, CA 95616
Phone: (530) 757-1245

Canada
275 Slater St., Suite 900
Ottawa, Ontario K1P 5H9
Phone: (613) 247-6285

	United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
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Application for Pesticide – Section I

1. Company/Product Number <div style="text-align: center; font-weight: bold;">85353-3</div>	2. EPA Product Manager <div style="text-align: center; font-weight: bold;">Marshall Swindell</div>	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) CuVerro® III	PM# <div style="text-align: center; font-weight: bold;">33</div>	
5. Name And Address Of Applicant (Include ZIP Code) Global Brass and Copper, Inc. 427 North Shamrock Street East Alton, Illinois 62024 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____

Section II

<input type="checkbox"/> Amendment – Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification – Explain below.	<input type="checkbox"/> Final Printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other – Explain Below.
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Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of Label Notification to update non-food use sites (consistent with parent product), add descriptive text consistent with antimicrobial claims, and add logo consistent with alternate brand name.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Please confirm receipt with Micah Reynolds: mreynolds@tsgusa.com, phone (202) 828-8967, or fax (202) 872-0745.

Section III

1. Material This Product Will Be Packaged In:			
Child Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No * Certification must be submitted	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. Container	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. Container	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(S) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithographed <input type="checkbox"/> Other _____ <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			

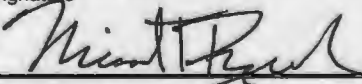
Section IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name Micah T. Reynolds, Technology Sciences Group, Inc.	Title Senior Regulatory Consultant	Telephone No. (Include Area Code) (202) 828-8967
---	--	--

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature 	3. Title Regulatory Consultant to Global Brass and Copper, Inc.
4. Typed Name Micah T. Reynolds	5. Date May 14, 2013

6. Date Application Received

(Stamped)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



United States
Environmental Protection
Agency

Office of Pesticide Programs

Technology Sciences Group Inc
c/o Globe Brass and Copper Inc.
1150 18th Street, Suite 1000
Washington, D. C. 20036

MAR 8 2013

Attention: Micah T. Reynold

Subject: CuVerro® III
EPA Registration No. 85353-3
Amendment Dated January 2, 2013

The amendment, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable.

Proposed Amendment

- Minor Formulation Change

General Comment

The Basic Confidential Statement of Formula (CSF) dated December 31, 2012 to add additional alloys, is found to be acceptable. A copy of the product chemistry review is enclosed for your file.

If you have any questions concerning this letter, please contact Martha Terry at (703) 308-6217.

Sincerely,

A handwritten signature in cursive script, appearing to read "M. Swindell".

Marshall Swindell
Product Manager (33)
Regulatory Management Branch 1
Antimicrobials Division (7510P)

Enclosure

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



United States
Environmental Protection
Agency

Office of Pesticide Programs

Antimicrobials Division (AD)

February 21, 2013

DP BARCODE: 408293

MRID:

SUBJECT: CuVerro® III

REG. NO.: 85353-3

DOCUMENT TYPE: Product Chemistry Review

Manufacturing-use [] OR End-use Product [X]

INGREDIENTS:

<u>PC Code(s)</u>	<u>CAS Number</u>	<u>Active Ingredient(s)</u>
022501	7440-50-8	Copper

TEST LAB:

SUBMITTER: Technology Sciences Group Inc.
GUIDELINE:

ORGANIZATION: AD\PSB\CTT

REVIEWER: Lynette T. Umez-Eronini

APPROVED BY: Karen P. Hicks

APPROVED DATE: February 21, 2013

COMMENT: This product is for non-food use.

L. Umez-E.
2/25/2013

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



Office of Pesticide Programs

Antimicrobials Division (AD)

February 21, 2013

MEMORANDUM

SUBJECT: Product Chemistry Review for EPA Reg. 85353-3
Product Name: CuVerro® III
DP Barcode: 408293

CODE: 362 Formula Change; Technical;

DATE DUE: April 4, 2013

FROM: Lynette T. Umez-Eronini, Chemist *Lynette T. Umez-Eronini*
Chemistry and Toxicology Team
Product Science Branch
Antimicrobials Division (7510P)

THRU: Karen Hicks, Team Leader
Chemistry and Toxicology Team
Product Science Branch
Antimicrobials Division (7510P) *K. P. H.*

TO: Marshall Swindell PM #33/Martha Terry
Regulatory Management Branch I
Antimicrobials Division (7510P)

Applicant: Global Brass and Copper Inc.

PRODUCT FORMULATION FROM LABEL:

<u>Active Ingredient(s):</u>	<u>% by wt.</u>
Copper	82.6
<u>Other Ingredient(s)</u>	<u>17.4</u>
Total:	100

BACKGROUND:

The consultant, Technology Sciences Group Inc., on behalf of the registrant, Global Brass and Copper Inc., has submitted an amendment to revise the Basic Confidential Statement of Formulation (CSF). The revision includes additional alloys to the formulation of a product called CuVerro® III. The product is intended for the manufacture and fabrication of touch surface components for use in hospitals, healthcare facilities, and various public, commercial, and residential buildings. This product is for non-food use. CuVerro® III is an end-use product and is produced by an integrated system.

The original data package was reviewed and included:

1. A letter from the registrant to EPA, January 2, 2013.
2. Application for Amendment (EPA Form 8570-1), January 2, 2013.
3. A Basic CSF, July 6, 2011.
4. A Copper Development Association (CDA) Basic CSF, August 1, 2012.
5. Basic CSF, December 31, 2012.

FINDINGS:

1. Basic CSF, July 6, 2011 and August 1, 2012 and product label, September 20, 2012 are used as references.
2. The nominal concentration of the active ingredient on the CSF, December 31, 2012 is consistent with the product label.

CONCLUSION:

The Product Science Branch of Antimicrobials Division finds the submission for the amendment for 85353-3 to add more alloys to the Basic CSF, December 31, 2012 to be acceptable.

6. The OPPTS 830.7100 "Viscosity" study suggested is not available however it was reported as being equivalent to water. No rationale has been provided. Registrant updated the information (see 830 Group A table below).
7. The registrant conducted the OPPTS 830.6313 Stability to Normal and Elevated Temperatures, Metals, and Metal Ions (MRID # 48850102) and the results are as follows:

Test	Results for sodium pyrithione 40%				
Stability to Normal and Elevated Temperatures, Metals, and Metal Ions	Days				
	0	1	2	7	14
Untreated	% sodium pyrithione (Mean)				
Ambient temp.	41.22	41.39	41.78	41.57	41.52
54 °C		41.48	41.43	41.60	41.19
Iron Chips					
Ambient temp.	41.39	40.67	41.35	41.09	40.95
54 °C		40.86	40.71	39.20	35.65
Iron Acetate					
Ambient temp.	40.20	39.87	38.87	39.19	39.13
54 °C		40.20	39.11	39.40	37.98
Aluminum Shot					
Ambient temp.	40.41	40.73	41.12	41.47	41.60
54 °C		40.44	40.46	41.23	41.20
Aluminum Acetate					
Ambient temp.	40.95	40.01	40.11	40.41	40.53
54 °C		39.37	38.90	36.40	36.01

CONCLUSIONS:

The CSF, dated 11/05/12, for the basic formulation is acceptable. The OPPTS 830 Groups (A & B) guidelines for product chemistry data requirements applicable to manufacturing-use products have been met with the exception of OPPTS 830.6317 (Storage Stability) and OPPTS 830.6320 (Corrosion Characteristics). See Table A of this report. The OPPTS 830.6317 (Storage Stability) and OPPTS 830.6320 (Corrosion Characteristics) will be available once the studies have been completed. The MRID # 48850101 is partially acceptable because it does not harmonize with some of the guidelines. The product Chemistry package is complete once the two guidelines mentioned above have been satisfied.

RECOMMENDATIONS:

1. The registrant must conduct the OPPTS 830.6317 (Storage Stability) and OPPTS 830.6320 (Corrosion Characteristics) studies for a minimum of 1 year. The concentration of the active ingredient in the product must be determined at the beginning of the test period and every 3 months thereafter for a period of 1 year. Storage and disposal information on the product label must be revised if product composition (or packaging) deteriorates over time. The product should be tested in its commercial packaging.

PRODUCT CHEMISTRY REVIEW

I. CONFIDENTIAL STATEMENT OF FORMULA

a. Type of formulation and source registration:

- Non-integrated formulation system ☐
- Are all TGAIs used registered? Yes ☐ No ☐
- Integrated formulation system ☒
- If "ME-TOO," specify EPA Reg. No. of existing product: _____

b. Clearance of inerts for non-food:

Yes ☒ No ☐

Note: This product is not intended for use on food contact surfaces.

c. Physical state of product:

liquid

d. The chemical IDs and analytical information (including that for the TGAIs), density, pH, and flammability are consistent with that given in 830 Series, Group B.

Yes ☒ No ☐

e. The NCs and CLs are acceptable.

Yes ☒ No ☐

f. Active ingredient

<u>NC</u>	<u>LCL</u>	<u>UCL</u>
(%)	(%)	(%)

Sodium Pyrithione

42.60

43.88

41.32

This nominal concentration does not match with the label. The label shows 40%.

g. For products produced by an integrated formulation system:

- Do all impurities of toxicological significance have a UCL?
Yes ☐ No ☐ Not applicable ☐
- Have all impurities of $\geq 0.1\%$ in the product been identified?
Yes ☐ No ☒ Not applicable ☐

II PRODUCT LABEL

a. The active ingredient(s) statement (chemical IDs and NC) is consistent with the CONFIDENTIAL STATEMENT OF FORMULA. Yes ☒ No ☐

b. The formula contains one of the following:

- | | | |
|--|------------------------------|--|
| • 10% or more of a petroleum distillate: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| • 1.0% or more of methyl alcohol: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| • sodium nitrite at any level: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| • a toxic List 1 inert at any level: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| • arsenic in any form: | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

c. If "yes" to any of the above, does the inert ingredients statement contain a footnote indicating this? Yes ☐ No ☐ Not applicable ☒

d. Appropriate warning statement(s) regarding flammability or explosive characteristics of the product are listed on the label.

Yes ☐ No ☐ Not applicable ☒

e. The storage and disposal instructions for the pesticide container are in compliance with PR Notice 84-1 for household use products or PR Notice 83-3 for all other uses.

Yes ☒ No ☐

f. The product requires an expiration date at which time the NC falls below the LCL (based on the 1-year storage stability data or other information).

Yes ☐ No ☐

Note: Storage stability studies are ongoing and have not been completed.

Table A:
Product Chemistry (Series 830, Group A)

Data Requirements	Acceptance of Information	MRID No.
830.1550 Product Identity ¹	A	48850101
830.1600 Description of Materials	A	48850101
830.1620 Production Process ²	A	48850101
830.1650 Formulation Process ³	A	48850101
830.1670 Formation of Impurities ⁴	A	48850101
830.1700 Preliminary Analysis ⁵	U	48850101
	Registrant provided additional information and it is acceptable.	
830.1750 Certified Limits ⁶	A – Standard certified limits were proposed. (see CSF)	48850101
830.1800 Enforcement Analytical Method ⁷	A – A copy of an HPLC method was provided.	48850101
830.1900 Submittal of Samples	<i>[Samples are to be provided on a case-by-case basis for end-use products.]</i>	

Explanation: A=acceptable; N=not acceptable (i.e., item was submitted but is not acceptable); NA=technically not applicable (i.e., not required); G=data gap (i.e., item was not submitted but is required); U=requires upgrading (i.e., item is unacceptable but upgradeable); W=waived; E=EPA estimate.

¹See Confidential Appendix A for additional information.

²For MP/EP products produced by an integrated formulation system.

³For products from a TGA I or MP.

⁴May be waived unless actual/possible impurities are of toxicological concern.

⁵Five batch analysis required for products produced by an integrated formulation system.

⁶If different from standard CLs recommended in 40 CFR 158.175, this should be discussed in Confidential Appendix A.

⁷Abbreviate method used as follows: gas chromatography (GC), infrared (IR), ultraviolet absorption (UV), nuclear magnetic resonance (NMR), etc.

Table B:
Physical and Chemical Characteristics (Series 830, Group B)

Physical/Chemical Properties*	Acceptance of Data	Value or Qualitative Description	MRID No.
830.6302 Color	A	Clear, transparent	48850101
830.6303 Physical State	A	Liquid	48850101
830.6304 Odor	A	Slight	48850101
830.6313 Stability to Normal and Elevated Temperatures, Metals, and Metal Ions	NR	[Not required for end-use products.] However, the registrant conducted the study. See finding #7.	48850102
830.6314 Oxidation/Reduction; Chemical Incompatibility	A	Product does not contain any oxidizing or reducing agents.	48850101
830.6315 Flammability/ Flame Extension	A	The product is aqueous based therefore the flash point would be greater than 100 °C.	48850101
830.6316 Explodability	A	The product does not have explosive characteristics.	48850101
830.6317 Storage Stability	G	A storage stability study is currently underway. Results will be provided to EPA once the study is complete.	48850101
830.6319 Miscibility ¹	A	Miscible in methanol, not miscible in octanol.	48850101
830.6320 Corrosion Characteristics	G	A corrosion characteristics study is currently underway. Results will be provided to EPA once the study is complete.	48850101
830.6321 Dielectric Breakdown Voltage	A	The product will not be used around electrical equipment.	48850101
830.7000 pH ²	A	7.69 @ 25 °C	48850101
830.7050 UV/Visible Absorption	NR	[Not required for end-use products.]	
830.7100 Viscosity	N	Equivalent to water.	48850101
	A	6.6 @ 20 °C ; 3.3 @ 40 °C	
830.7200 Melting Point/Melting Range	NR	[Not required for end-use products.]	
830.7220 Boiling Point/Boiling Range	A	[Not required for end-use products.] However, it was reported as 102°C.	48850101
830.7300 Density/Relative Density/Bulk Density	A	1.222 g/ml @ 20 °C	48850101
830.7370 Dissociation Constants in Water	NR	[Not required for end-use products.]	
830.7550/830.7560/830.7570 Partition Coefficient	NR	[Not required for end-use products.]	
830.7840/830.7860 Water Solubility	NR	[Not required for end-use products.]	
830.7950 Vapor Pressure	NR	[Not required for end-use products.]	

Explanation: A=acceptable; N=not acceptable; NR=not required; NA=technically not applicable; G=data gap; U=requires upgrading.



Technology Sciences Group Inc.

1150 18th Street, Suite 1000
Washington, DC 20036
Direct: (202) 828-8967
Fax: (202) 872-0745
E-Mail: MReynolds@TSGUSA.com

Micah T. Reynolds
Regulatory Consultant

CONTAINS CONFIDENTIAL BUSINESS INFORMATION

January 2, 2013

Global Brass and Copper, Inc.
Minor Formulation Amendment/CSF Revision
for CuVerro® I; EPA Reg. No. 85353-1

Mr. Marshall Swindell, PM-33
Antimicrobials Division (7510P)
Office of Pesticide Programs (AMEND)
U.S. Environmental Protection Agency
Document Processing Center
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202

Dear Mr. Swindell:

Technology Sciences Group, Inc., on behalf of Global Brass and Copper, Inc., is submitting the enclosed minor formulation fast-track/non-PRIA amendment with CSF revision for the above-referenced product. In 2012, the Copper Development Association (CDA) updated its antimicrobial copper alloy registrations to add additional alloys; therefore accordingly, Global Brass and Copper herein requests update of its respective product CSF to align with the corresponding CDA product on which CuVerro® I is based. Global Brass and Copper is a member of CDA and has authorization to rely upon data submitted by CDA; this authorization and Stewardship letter were submitted with the original registration application for this product.

The enclosed proposed CSF reflects the changes recently made by the CDA to its product and subsequently approved by the Agency in November 2012.

Please find enclosed the following documents supporting this submission:

- 1) Application for Amendment (EPA Form 8570-1);
- 2) Current Confidential Statement of Formula, version dated July 2011 (1 copy);
- 3) Referenced CDA Confidential Statement of Formula (1 copy);
- 4) Proposed Revised Confidential Statement of Formula (2 copies).

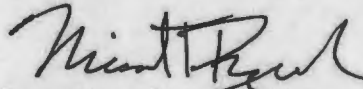
Washington, D.C.
1150 18th St., NW, Suite 1000
Washington, D.C. 20036
Phone: (202) 223-4392

California
712 Fifth St., Suite A
Davis, CA 95616
Phone: (530) 757-1245

Canada
275 Slater St., Suite 900
Ottawa, Ontario K1P 5H9
Phone: (613) 247-6285

If you have any questions or require additional information or clarification, please do not hesitate to contact me by phone at (202) 828-8967 or by e-mail at mreynolds@tsgusa.com.

Sincerely,


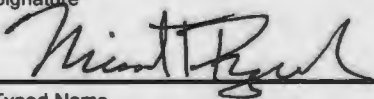


Regulatory Consultant to
Global Brass and Copper, Inc.

Enclosures

CC: M. Visnack (Global Brass and Copper, Inc.)

31

		United States Environmental Protection Agency Washington, DC 20460		<input type="checkbox"/> Registration <input checked="" type="checkbox"/> Amendment <input type="checkbox"/> Other		OPP Identifier Number	
Application for Pesticide – Section I							
1. Company/Product Number 85353-1				2. EPA Product Manager Marshall Swindell		3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted	
4. Company/Product (Name) CuVerro® I				PM# 33			
5. Name And Address Of Applicant (Include ZIP Code) Global Brass and Copper, Inc. 427 North Shamrock Street East Alton, Illinois 62024 <input type="checkbox"/> Check if this is a new address				6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 82012-5 Product Name Antimicrobial Copper Alloys Group V			
Section II							
<input checked="" type="checkbox"/> Amendment – Explain below. <input type="checkbox"/> Final Printed labels in response to Agency letter dated _____ <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Notification – Explain below. <input type="checkbox"/> Other – Explain Below.							
Explanation: Use additional page(s) if necessary. (For section I and Section II.) Submission of Fast-Track, Minor Formulation Amendment to update this product's Confidential Statement of Formula to sync with its referenced Me-Too product on which additional alloys were recently approved in November 2012. Please confirm receipt with Micah Reynolds: mreynolds@tsqusa.com, phone (202) 828-8967, or fax (202) 872-0745.							
Section III							
1. Material This Product Will Be Packaged In:							
Child Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No * Certification must be submitted		Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. Container		Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. Container		2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input checked="" type="checkbox"/> Other (Specify) <u>none</u>	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container			4. Size(S) Retail Container N/A – no container			5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input checked="" type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product				<input type="checkbox"/> Lithographed <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input checked="" type="checkbox"/> Other <u>Attached to Bill of Lading</u>			
Section IV							
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)							
Name Micah T. Reynolds, Technology Sciences Group, Inc.				Title Regulatory Consultant		Telephone No. (Include Area Code) (202) 828-8967	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.						6. Date Application Received (Stamped)	
2. Signature 				3. Title Regulatory Consultant to Global Brass and Copper, Inc.			
4. Typed Name Micah T. Reynolds				5. Date January 2, 2013			

DECISION PKG. NO. 472847
SUBMISSION BAR CODE # 927679

SUBM. DUE DATE 1/4/13
REVIEWER MT

CODING FORM FOR APPLICATIONS FOR REGISTRATION/AMENDMENTS

FILE SYMBOL/REG NO. 85353-3 PM 33 ACTION CODE 332
DESCRIPTOR Notification **FOPA** ☒ **NFOPA**

[] CHILD RESISTANT PACKAGING: [] REQUIRED [] NOT REQUIRED
REGISTRATION TYPE: [] CONDITIONAL [] UNCONDITIONAL [] RESTRICTED USE

DATE ON APPLICATION 12/03/12 EPA RECEIVE DATE 12/25/12 PM RECEIVE DATE 12/05/12

METHOD OF SUPPORT FORMULATORS EXEMPTION
[] CITE-ALL [] SELECTIVE [] SUBMITTED [] NOT SUBMITTED
[] NOT SUBMITTED [] N/A [] N/A

REVIEW(S) REQUESTED	DATA PACK #	DATE SENT	DUE DATE	DATE RETURNED
CHEMISTRY				
EFFICACY				
ACUTE TOX.				
RASSB TOX.				
ENVIRON. FATE				
FISH/WILDLIFE				
OTHER:				

STATUS _____

RESPONSE CODE 1155 RESPONSE DATE JAN 3 2013

SCIENCE GROUP	DIVISION	BRANCH	SECTION	CSF Y/N	LABEL Y/N
CHEMISTRY	AD	EASSB	CTT		
EFFICACY	AD	EASSB	EET		

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JAN 3 13



United States
Environmental Protection
Agency

Office of Pesticide Programs

Globe Brass and Copper Inc.
427 North Shamrock Street
East Alton, IL 62024

Attention: Micah T. Reynolds

Subject: CuVerro® III
EPA Registration No. 85353-3
Notification Dated December 3, 2012

This will acknowledge receipt of your notification, submitted under the provisions of FIFRA Section 3(c)(9).

Proposed Notification

Additional Brand Name: CuVerro® III Bactericidal Copper Surfaces"

General Comments

Based on a review of the submitted material, the following comments apply.

The Notification is in compliance with PR Notice 98-10 and is acceptable. This information has been made a part of your file.

If you have any questions concerning this letter, please contact Martha Terry at (703) 308-6217.

Sincerely,

A handwritten signature in cursive script that reads "Martha Terry".

Marshall Swindell
Product Manager (33)
Regulatory Management Branch 1
Antimicrobials Division (7510P)



Technology Sciences Group Inc.

1150 18th Street, Suite 1000
Washington, DC 20036
Direct: (202) 828-8967
Fax: (202) 872-0745
E-Mail: MReynolds@TSGUSA.com

Micah T. Reynolds
Regulatory Consultant

December 3, 2012

**Global Brass and Copper, Inc.
Label Notification for CuVerro® III;
EPA Reg. No. 85353-3**

Mr. Marshall Swindell, PM-33
Antimicrobials Division (7510P)
Office of Pesticide Programs (NOTIF)
U.S. Environmental Protection Agency
Document Processing Center
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202

Dear Mr. Swindell:

Technology Sciences Group, Inc., on behalf of Global Brass and Copper, Inc., is submitting the enclosed label notification to add an alternate brand name to the master label of the above referenced product. Global Brass and Copper, Inc. seeks to add "CuVerro Bactericidal Copper Surfaces" as an alternate brand name to the product label. Please find enclosed the following documents supporting this notification:

- 1) Application for Notification (EPA Form 8570-1);
- 2) One (1) copy of the label with changes highlighted;
- 3) Three (3) copies of revised product labeling.

If you have any questions or require additional information or clarification, please do not hesitate to contact me by phone at (202) 828-8967 or by e-mail at mreynolds@tsgusa.com.

Sincerely,

Regulatory Consultant to
Global Brass and Copper, Inc.

Enclosures

CC: M. Visnack (Global Brass and Copper, Inc.)

Washington, D.C.
1150 18th St., NW, Suite 1000
Washington, D.C. 20036
Phone: (202) 223-4392

California
712 Fifth St., Suite A
Davis, CA 95616
Phone: (530) 757-1245

Canada
275 Slater St., Suite 900
Ottawa, Ontario K1P 5H9
Phone: (613) 247-6285

<div style="display: inline-block; text-align: center; margin-left: 20px;"> United States Environmental Protection Agency Washington, DC 20460 </div>		<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
Application for Pesticide – Section I			
1. Company/Product Number <div style="text-align: center; font-weight: bold;">85353-3</div>		2. EPA Product Manager <div style="text-align: center; font-weight: bold;">Marshall Swindell</div>	
4. Company/Product (Name) CuVerro® III		3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted	
5. Name And Address Of Applicant (Include ZIP Code) Global Brass and Copper, Inc. 427 North Shamrock Street East Alton, Illinois 62024 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	
Section II			
<div style="display: flex; justify-content: space-between;"> <div style="width: 48%;"> <input type="checkbox"/> Amendment – Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification – Explain below. </div> <div style="width: 48%;"> <input type="checkbox"/> Final Printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other – Explain Below. </div> </div>			
Explanation: Use additional page(s) if necessary. (For section I and Section II.) Submission of Label Notification to add additional alternate brand name. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA. Please confirm receipt with Micah Reynolds: mreynolds@tsqusa.com, phone (202) 828-8967, or fax (202) 872-0745.			
Section III			
1. Material This Product Will Be Packaged In:			
Child Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No * Certification must be submitted	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. Container	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. Container	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(S) Retail Container	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithographed <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
Section IV			
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Micah T. Reynolds, Technology Sciences Group, Inc.		Title Regulatory Consultant	
Telephone No. (Include Area Code) (202) 828-8967		6. Date Application Received <div style="text-align: center; font-weight: bold; font-size: 1.2em;">(Stamped)</div>	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			
2. Signature 		3. Title Regulatory Consultant to Global Brass and Copper, Inc.	
4. Typed Name <div style="text-align: center; font-weight: bold;">Micah T. Reynolds</div>		5. Date <div style="text-align: center; font-weight: bold;">December 3, 2012</div>	

[Alternate Brand Name: CuVerro® III Antimicrobial Copper Alloy]
CuVerro® III Bactericidal Copper Surfaces]

**CuVerro® III
AND ASSOCIATED FABRICATED PRODUCTS
MASTER LABEL**

The Master Label consists of the label that will accompany the CuVerro® III Antimicrobial Alloys and a label that will accompany each product fabricated using a registered CuVerro® III alloy.

[Alloy Label – Front Panel]

**CuVerro® III
AND ASSOCIATED FABRICATED PRODUCTS**

Active Ingredient:

Copper	82.6%
Other	17.4%
Total	100%

EPA Registration No. 85353-3
EPA Establishment No. 85353-XX

Made in the United States by:
Global Brass and Copper, Inc.
427 N. Shamrock Street
East Alton, IL 62024

Net Weight: XXX lbs XXX ounces of CuVerro® III

[See insert (side panel) (back panel) for Directions for Use]

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

CuVerro® III Antimicrobial Copper Alloys

This alloy is only intended for the manufacture and fabrication of touch surface components for use in hospitals, healthcare facilities, and various public, commercial, and residential buildings. [The claims listed on the attached fabricated product label may be made in connection with the marketing and sale of CuVerro® III Antimicrobial Copper Alloys and fabricated products made from CuVerro® III Antimicrobial Copper Alloys under EPA Registration Number 85353-3.]

A list of components that may be fabricated out of CuVerro® III Antimicrobial Copper Alloys is specified below. CuVerro® III Antimicrobial Copper Alloys are not approved for direct food contact or food packaging uses.

Touch Surface Components

Healthcare Facilities

- Bedrails, footboards
- Over-bed tables
- Bed-side tables in hospitals, extended care facilities, senior housing etc. (knobs, pulls, handles; surfaces)
- Handrails, (corridor/hallways) (Senior housing), automatic door push plates
- Stair rails, handrails, tubular railing, and supports, rail fittings T's, elbows and brackets
- Bedrails, assistance rails,
- Toilet safety rails
- Carts
 - Hospital carts (table surfaces, handles, legs)
 - Computer carts
 - Record carts
 - Phlebotomy carts
 - Other Carts (tables/surfaces, shelving, railings, handles, pulls)
- Equipment carts (horizontal surfaces, frames, handles)
- Door push plates, kick plates, mop plates, stretcher plates
- Sinks: spigots, drains, sinks themselves
- Faucet: handles, spigot, drain control lever
- Water fountains: bubbler head, drain strainer, handle
- Alcohol sanitizer dispenser, handle
- Paper towel holders, facial tissue holders, toilet paper holders
- Air hand dryer, controls and push buttons on air hand dryers
- Hydrotherapy tanks (whirlpool tanks): shells, covers, headrests, drain fittings (outer surfaces without water contact)
- Door handles, doorknobs (outer touch surfaces)
- Grab bars in bathrooms showers and bathtubs
- Panic bars on emergency room doors
- Towel bars

- Showerheads
- Countertops and tabletops (non-food use only)
- Hinges, locks, latches, and trim
- Door stops, door pulls, and protector guards
- Toilet and urinal hardware, levers, push buttons
- Toilet seat inlay for lifting of seat
- Closures
- Vertical locking arms
- Vertical cover guards
- Protection bars
- Light switches, switch plates
- Visitor chairs: armrests, metal frames
- Thermostat covers, control knobs and wheels
- Telephone handsets and surfaces (housings), keypad
- Kitchen surfaces (non-food contact only): table tops, counter tops, handles (microwave, refrigerator, stove), cabinet doors, cabinet hinges, pulls, backsplash, hoods, control knobs (appliances, fans)
- Floor tiles
- Ceiling tiles (non-porous)
- Wall tiles
- Instrument handles

Medical equipment knobs, pulls and handles for:

- Drug delivery systems
- Monitoring systems
- Hospital beds
- Office equipment
- Operating room equipment
- Stands and fixtures

Types of knobs: *e.g.*, Prong, fluted, knurled, push/pull, T-handle, tapered, and ball knobs

- Intravenous (IV) poles, bases, hangers, clips
- Trays (instruments, non-food contact)
- Pans (bed)
- Walkers, wheelchair handles, and tubular components
- Computer keyboards: keys, housings, computer mouse surfaces
- Exercise and rehabilitation equipment, handles, bars
- Physical therapy equipment: physical therapy tables, treatment chairs and portable taping tables
- Chairs (shower chairs, patient chairs, visitor chairs): rails, backs, legs, seats
- Lighting products: X-ray illuminators, operating rooms, patient examination rooms, surgical suites, and reading lamps for hospital rooms and assisted living facilities etc. Components can include bases, arms, housings, handles, hinges,
- Headwall systems: the unit themselves, outlet covers, knobs and dials, lighting units (lamp housings and adjustable arms), CRT monitors with rotating knobs and levers and adjustments. Baskets, monitor housings, knobs, baskets, tables, IV poles

- Critical care cart: Table top, drawer pull, lock, copper wire baskets for storage of equipment and charts.
- Bedside lavatory: sink, faucet, handles, drawer pulls, toilet seat, toilet seat cover, toilet handle, door and cabinet facings, counter tops
- Medical records: Chart holders, clipboards, filing systems
- Storage Shelving: wire shelving etc. for medical supplies
- Grab handles on privacy curtains
- Lids of laundry hampers, trash canisters, and other containers
- Bedside pitchers
- Closet rods and hangers
- Television controls: knobs, buttons, remote
- Monitor (television, computer, etc.) housing
- Cup Holder
- Toothbrush holder
- Soap holder
- Magazine rack
- Signage
- Coat rack and hooks
- Shower curtain rings
- Radiator cover
- Bracelets
- Pens
- Badge clips
- Name tags
- Patient gown snaps
- Window sills, pulls and locks
- Electrical wallplates

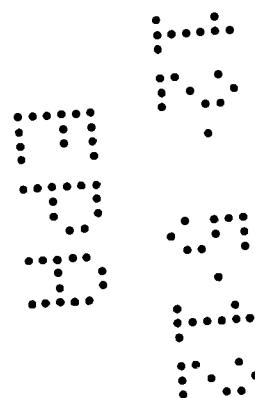
Community Facilities (including various public and commercial buildings)

- Shopping cart handles, child seats, handrails
- Cash registers: housing, keypads
- ATM machines: keys, housing
- Gym/Health club lockers, locker handles, locker shelving, trainers' tables,
- Ice and water dispensers (outer surfaces without water contact)
- Elevator: handrail, control panel, buttons, interior walls, floor tiles, exterior call button plate
- Paper towel dispensers. Housing itself, (turn) handle, (push) handle
- Soap holder
- Soap dispenser (wall mounted): push bar and dispenser itself
- Soap dispenser (sitting on counter): dispenser housing itself, push mechanism
- Toilet paper dispenser (housing)
- Windows (crank), Locking mechanism, pull handles
- Window treatments (cord pulls), Venetian blinds (wands, cord pulls)
- Jalousie Windows (crank)
- Casement (cranks, levers, hinges)
- Single and double-hung windows (locks and pulls)
- Light switches, switch plates

- Lids of laundry hampers, trash canisters, and other containers
- Magazine rack
- Signage
- Coat rack and hooks
- Shower curtain rings
- Radiator cover
- Bracelets
- Badge clips
- Name tags
- Vending machines (non-food contact only)
- Window sills
- Electrical wallplates
- Clip boards
- Office supplies: paper clips, staplers, tape dispensers

Residential Buildings (including homes, apartments, apartment buildings and other residences)

- Kitchen surfaces (non-food contact only): table tops, counter tops, handles (microwave, refrigerator, stove), cabinet doors, cabinet hinges, pulls, backsplash, hoods, control knobs (appliances, fans)
- Bedrails, footboards
- Handrails
- Stair rails
- Door push plates
- Sinks: spigots, drains, sinks themselves
- Faucet: handles, spigot, drain control lever
- Paper towel holders, facial tissue holders, toilet paper holders
- Door handles, doorknobs (outer touch surfaces)
- Grab bars in bathrooms showers and bathtubs
- Towel bars
- Showerheads
- Countertops and tabletops
- Hinges, locks, latches, and trim
- Door stops, door pulls, and protector guards
- Toilet and urinal hardware, levers, push buttons
- Toilet seat inlay for lifting of seat
- Light switches, switch plates
- Thermostat covers, control knobs and wheels
- Telephone handsets and surfaces (housings), keypad
- Floor tiles
- Ceiling tiles (non-porous)
- Wall tiles
- Computer keyboards: keys, housings, computer mouse surfaces
- Exercise equipment, handles, bars
- Windows (crank), Locking mechanism, pull handles
- Window treatments (cord pulls), Venetian blinds (wands, cord pulls)
- Jalousie Windows (crank)



- Casement (cranks, levers, hinges)
- Single and double-hung windows (locks and pulls)
- Television control knobs and buttons
- Lids of laundry hampers, trash canisters, and other containers
- Bedside pitchers
- Closet rods and hangers
- Television remote
- Cup Holder
- Toothbrush holder
- Soap holder
- Magazine rack
- Coat rack and hooks
- Shower curtain rings
- Radiator cover
- Window sills
- Electrical wallplates
- Baby cribs: rails, fittings, brackets, supports
- Bowl stands
- Office supplies: paper clips, staplers, tape dispensers
- Monitor (television, computer, etc.) housing

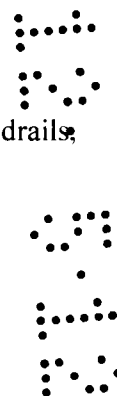
Mass Transit Facilities

- Handrails
- Stair rails, tubular railing, and supports; elbows and brackets
- Door push plates, kick plates
- Door handles, door knobs (outer touch surfaces)
- Grab bars and handles
- Tiles: wall, floor, ceiling (non-porous)
- Chairs and benches: rails, backs, legs, seats
- Window sills, pulls, and handles
- Signage
- Vending machines (non-food contact only)

Other

- Play area equipment (indoor only): bars, handles, chains, push plates, handrails, stair rails and risers, wheels, knobs, flooring
- Chapel pews
- Eye glass frames and protective eye wear
- Pens
- Combs
- Ashtrays

Do not wax, paint, lacquer, varnish, or otherwise coat touch surfaces.



CuVerro[®] III – Fabricated Products

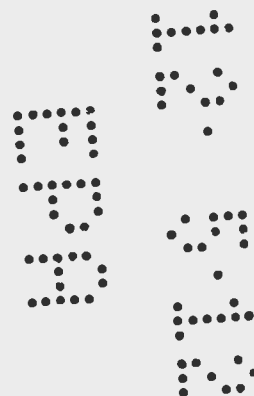
The CuVerro[®] III fabricated products listed above may be sold and distributed under EPA Registration Number 85353-3. Products fabricated with CuVerro[®] III Antimicrobial Copper Alloys must bear the EPA approved fabricated product label, below, with one or more of the listed claims.

STORAGE AND DISPOSAL

Dispose of excess by recycling.

WARRANTY STATEMENT

If used as intended, this product is wear-resistant and the durable antibacterial properties will remain effective for as long as the product remains in place and is used as directed.



CuVerro® III
Fabricated Product Label

FRONT

[This (touch surface) (product)] made from
CuVerro® III
Active Ingredient:
Copper82.6%
Other.....17.4%
[Total 100.0%]
See [Back/Side Panel][Insert] for Directions for Use
Net Weight: XXX lbs XXX ounces of CuVerro® III

BACK

CuVerro® III
Laboratory testing has shown that when cleaned regularly this surface:
- Continuously reduces bacterial* contamination, achieving 99.9% reduction within 2 hours of exposure.
- Kills greater than 99.9% of Gram-negative and Gram-positive bacteria* within 2 hours of exposure.
- Delivers continuous and ongoing antibacterial* action, remaining effective in killing greater than 99.9% of bacteria* within 2 hours.
- Kills greater than 99.9% of bacteria* within two hours and continues to kill 99% of bacteria* even after repeated contaminations.
- Helps inhibit the buildup and growth of bacteria* within 2 hours of exposure between routine cleaning and sanitizing steps.
- [This product/component name] is made (out of)(from) a (copper)(touch) surface that continuously kills bacteria left behind (by dirty hands)[on the surface] killing more than 99.9% of bacteria* within 2 hours.
* *Staphylococcus aureus*, *Enterobacter aerogenes*, Methicillin-Resistant *Staphylococcus aureus* (MRSA), *Escherichia coli* O157:H7, *Pseudomonas aeruginosa* and, Vancomycin – Resistant *Enterococcus faecalis* (VRE).

DIRECTIONS FOR USE
It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Proper Care and Use. Clean and sanitize according to standard practice. Healthcare facilities must maintain the product in accordance with infection control guidelines. The use of this surface is a supplement to and not a substitute for standard infection control practices; users must continue to follow all current infection control practices, including those practices related to cleaning and disinfection of environmental surfaces. This surface has been shown to reduce microbial contamination, but does not necessarily prevent cross contamination.

This surface may be subject to recontamination and the level of active bacteria at any time will depend on the frequency and timing of recontamination and cleanliness of the surface (among other factors). In order to have proper antimicrobial effect, this product must be cleaned and maintained according to the directions for use.

Do not wax, paint, lacquer, varnish, or otherwise coat this product.

Routine cleaning to remove dirt and filth is necessary for good sanitation and to assure the effective antibacterial performance of this surface. Cleaning agents typically used for traditional hard, non-porous touch surfaces are permissible. The appropriate cleaning agent depends on the type of soiling and the measure of sanitization required. Normal tamishing or wear of this surface will not impair antibacterial effectiveness.

Not approved for direct food contact or food packaging uses.

[Items exposed to outdoor environmental conditions are not representative of indoor laboratory test conditions, and, therefore, may impart reduced efficacy if not cleaned when visibly soiled.]

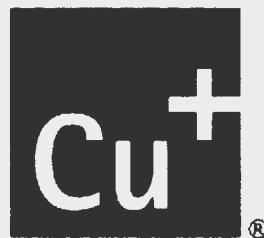
STORAGE AND DISPOSAL
Dispose of by recycling or put in trash.

WARRANTY STATEMENT
If used as intended, this product is wear-resistant and the durable antibacterial properties will remain effective for as long as the product remains in place and is used as directed.

EPA Reg. No. 85353-3 EPA Est. No. [Product Manufacturer Number]- 85353-XX
Manufactured by: [Product Manufacturer Company Name and Address]
Global Brass and Copper, Inc. 427 North Shamrock Street East Alton, IL 62024

[Optional Logos for Use with Alloy Label or Fabricated Product Label]

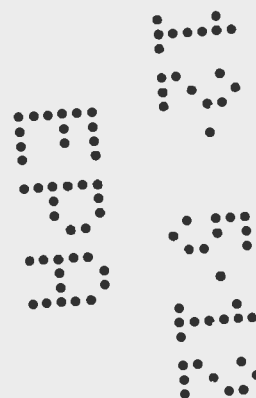
Antimicrobial
Copper



CuVerro®

CuVerro®

Antimicrobial Copper Surfaces





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

SEP 20 2012

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Mr. M. Visnack
President for,
Global Brass and Copper, Inc.
One Revere Park
Rome, NY 13440

Mail to: Mr. Micah T. Reynolds
1150 18th Street, NW, Suite 1000
Washington, D.C. 20036

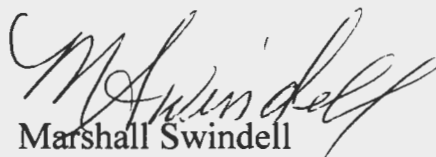
Subject: CuVerro III
EPA Registration Number 85353-3
Your Notification Dated August 20, 2012
EPA Received Date August 21, 2012

The notification referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, FIFRA, as amended, to add marketing logo to the product labeling, is acceptable.

The notification has been made part of the permanent file.

If you have questions concerning this letter, please contact Karen M. Leavy at (703)-308-6237.

Sincerely,

A handwritten signature in cursive script, appearing to read "M. Swindell".

Marshall Swindell
Product Manager 33
Regulatory Management Branch I
Antimicrobial Division(7510P)

Alternate Brand Name: CuVerro® III Antimicrobial Copper Alloy

**CuVerro® III
AND ASSOCIATED FABRICATED PRODUCTS
MASTER LABEL**

The Master Label consists of the label that will accompany the CuVerro® III Antimicrobial Alloys and a label that will accompany each product fabricated using a registered CuVerro® III alloy.

[Alloy Label – Front Panel]

**CuVerro® III
AND ASSOCIATED FABRICATED PRODUCTS**

Active Ingredient:

Copper	82.6%
Other	17.4%
Total	100%

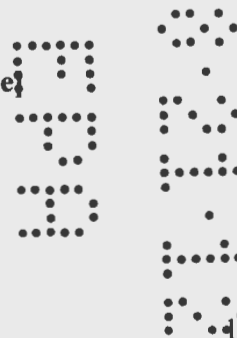
EPA Registration No. 85353-3
EPA Establishment No. 85353-XX

Made in the United States by:
Global Brass and Copper, Inc.
427 N. Shamrock Street
East Alton, IL 62024

Net Weight: XXX lbs XXX ounces of CuVerro® III

[See insert (side panel) (back panel) for Directions for Use]

NOTIFICATION
Date Reviewed: 7/20/12
Reviewed By: [Signature]



DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

CuVerro® III Antimicrobial Copper Alloys

This alloy is only intended for the manufacture and fabrication of touch surface components for use in hospitals, healthcare facilities, and various public, commercial, and residential buildings. [The claims listed on the attached fabricated product label may be made in connection with the marketing and sale of CuVerro® III Antimicrobial Copper Alloys and fabricated products made from CuVerro® III Antimicrobial Copper Alloys under EPA Registration Number 85353-3.]

A list of components that may be fabricated out of CuVerro® III Antimicrobial Copper Alloys is specified below. CuVerro® III Antimicrobial Copper Alloys are not approved for direct food contact or food packaging uses.

Touch Surface Components

Healthcare Facilities

- Bedrails, footboards
- Over-bed tables
- Bed-side tables in hospitals, extended care facilities, senior housing etc. (knobs, pulls, handles; surfaces)
- Handrails, (corridor/hallways) (Senior housing), automatic door push plates
- Stair rails, handrails, tubular railing, and supports, rail fittings T's, elbows and brackets
- Bedrails, assistance rails,
- Toilet safety rails
- Carts
 - Hospital carts (table surfaces, handles, legs)
 - Computer carts
 - Record carts
 - Phlebotomy carts
 - Other Carts (tables/surfaces, shelving, railings, handles, pulls)
- Equipment carts (horizontal surfaces, frames, handles)
- Door push plates, kick plates, mop plates, stretcher plates
- Sinks: spigots, drains, sinks themselves
- Faucet: handles, spigot, drain control lever
- Water fountains: bubbler head, drain strainer, handle
- Alcohol sanitizer dispenser, handle
- Paper towel holders, facial tissue holders, toilet paper holders
- Air hand dryer, controls and push buttons on air hand dryers
- Hydrotherapy tanks (whirlpool tanks): shells, covers, headrests, drain fittings, (outer surfaces without water contact)
- Door handles, doorknobs (outer touch surfaces)
- Grab bars in bathrooms showers and bathtubs
- Panic bars on emergency room doors
- Towel bars

NOTIFICATION
Date Reviewed: 9/20/13
Reviewed By: E. Leary

- Showerheads
- Countertops and tabletops (non-food use only)
- Hinges, locks, latches, and trim
- Door stops, door pulls, and protector guards
- Toilet and urinal hardware, levers, push buttons
- Toilet seat inlay for lifting of seat
- Closures
- Vertical locking arms
- Vertical cover guards
- Protection bars
- Light switches, switch plates
- Visitor chairs: armrests, metal frames
- Thermostat covers, control knobs and wheels
- Telephone handsets and surfaces (housings), keypad
- Kitchen surfaces (non-food contact only): table tops, counter tops, handles (microwave, refrigerator, stove), cabinet doors, cabinet hinges, pulls, backsplash, hoods, control knobs (appliances, fans)
- Floor tiles
- Ceiling tiles (non-porous)
- Wall tiles
- Instrument handles
 - Medical equipment knobs, pulls and handles for:
 - Drug delivery systems
 - Monitoring systems
 - Hospital beds
 - Office equipment
 - Operating room equipment
 - Stands and fixtures
 - Types of knobs: e.g., Prong, fluted, knurled, push/pull, T-handle, tapered, and ball knobs
- Intravenous (IV) poles, bases, hangers, clips
- Trays (instruments, non-food contact)
- Pans (bed)
- Walkers, wheelchair handles, and tubular components
- Computer keyboards: keys, housings, computer mouse surfaces
- Exercise and rehabilitation equipment, handles, bars
- Physical therapy equipment: physical therapy tables, treatment chairs and portable taping tables
- Chairs (shower chairs, patient chairs, visitor chairs): rails, backs, legs, seats
- Lighting products: X-ray illuminators, operating rooms, patient examination rooms, surgical suites, and reading lamps for hospital rooms and assisted living facilities etc. Components can include bases, arms, housings, handles, hinges,
- Headwall systems: the unit themselves, outlet covers, knobs and dials; lighting units (lamp housings and adjustable arms), CRT monitors with rotating knobs and levers and adjustments. Baskets, monitor housings, knobs, baskets, tables, IV poles

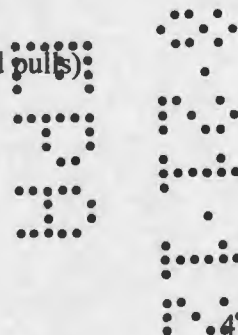
NOTIFICATION
Date Reviewed: 7/20/12
Reviewed By: K. Leary

- Critical care cart: Table top, drawer, drawer pull, lock, copper wire baskets for storage of equipment and charts.
- Bedside lavatory: sink, faucet, handles, drawer pulls, toilet seat, toilet seat cover, toilet handle, door and cabinet facings, counter tops
- Medical records: Chart holders, clipboards, filing systems
- Storage Shelving: wire shelving etc. for medical supplies
- Grab handles on privacy curtains
- Lids of laundry hampers, trash canisters, and other containers
- Bedside pitchers
- Closet rods and hangers
- Television controls: knobs, buttons, remote
- Monitor (television, computer, etc.) housing
- Cup Holder
- Toothbrush holder
- Soap holder
- Magazine rack
- Signage
- Coat rack and hooks
- Shower curtain rings
- Radiator cover
- Bracelets
- Pens
- Badge clips
- Name tags
- Patient gown snaps
- Window sills, pulls and locks
- Electrical wallplates

Community Facilities (including various public and commercial buildings)

- Shopping cart handles, child seats, handrails
- Cash registers: housing, keypads
- ATM machines: keys, housing
- Gym/Health club lockers, locker handles, locker shelving, trainers' tables,
- Ice and water dispensers (outer surfaces without water contact)
- Elevator: handrail, control panel, buttons, interior walls, floor tiles, exterior call button plate
- Paper towel dispensers. Housing itself, (turn) handle, (push) handle
- Soap holder
- Soap dispenser (wall mounted): push bar and dispenser itself
- Soap dispenser (sitting on counter): dispenser housing itself, push mechanism
- Toilet paper dispenser (housing)
- Windows (crank), Locking mechanism, pull handles
- Window treatments (cord pulls), Venetian blinds (wands, cord pulls)
- Jalousie Windows (crank)
- Casement (cranks, levers, hinges)
- Single and double-hung windows (locks and pulls)
- Light switches, switch plates

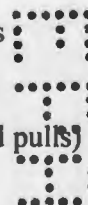
NOTIFICATION
Date Reviewed: 9/20/12
Reviewed By: L. UTM



- Lids of laundry hampers, trash canisters, and other containers
- Magazine rack
- Signage
- Coat rack and hooks
- Shower curtain rings
- Radiator cover
- Bracelets
- Badge clips
- Name tags
- Vending machines (non-food contact only)
- Window sills
- Electrical wallplates
- Clip boards
- Office supplies: paper clips, staplers, tape dispensers

Residential Buildings (including homes, apartments, apartment buildings and other residences)

- Kitchen surfaces (non-food contact only): table tops, counter tops, handles (microwave, refrigerator, stove), cabinet doors, cabinet hinges, pulls, backsplash, hoods, control knobs (appliances, fans)
- Bedrails, footboards
- Handrails
- Stair rails
- Door push plates
- Sinks: spigots, drains, sinks themselves
- Faucet: handles, spigot, drain control lever
- Paper towel holders, facial tissue holders, toilet paper holders
- Door handles, doorknobs (outer touch surfaces)
- Grab bars in bathrooms showers and bathtubs
- Towel bars
- Showerheads
- Countertops and tabletops
- Hinges, locks, latches, and trim
- Door stops, door pulls, and protector guards
- Toilet and urinal hardware, levers, push buttons
- Toilet seat inlay for lifting of seat
- Light switches, switch plates
- Thermostat covers, control knobs and wheels
- Telephone handsets and surfaces (housings), keypad
- Floor tiles
- Ceiling tiles (non-porous)
- Wall tiles
- Computer keyboards: keys, housings, computer mouse surfaces
- Exercise equipment, handles, bars
- Windows (crank), Locking mechanism, pull handles
- Window treatments (cord pulls), Venetian blinds (wands, cord pulls)
- Jalousie Windows (crank)



NOTIFICATION
Date Reviewed: 8/20/12
Reviewed By: K. L. [signature]

- Casement (cranks, levers, hinges)
- Single and double-hung windows (locks and pulls)
- Television control knobs and buttons
- Lids of laundry hampers, trash canisters, and other containers
- Bedside pitchers
- Closet rods and hangers
- Television remote
- Cup Holder
- Toothbrush holder
- Soap holder
- Magazine rack
- Coat rack and hooks
- Shower curtain rings
- Radiator cover
- Window sills
- Electrical wallplates
- Baby cribs: rails, fittings, brackets, supports
- Bowl stands
- Office supplies: paper clips, staplers, tape dispensers
- Monitor (television, computer, etc.) housing

Mass Transit Facilities

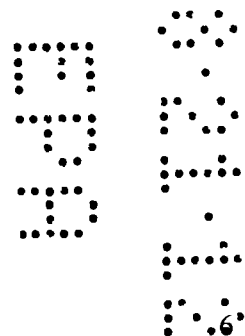
- Handrails
- Stair rails, tubular railing, and supports; elbows and brackets
- Door push plates, kick plates
- Door handles, door knobs (outer touch surfaces)
- Grab bars and handles
- Tiles: wall, floor, ceiling (non-porous)
- Chairs and benches: rails, backs, legs, seats
- Window sills, pulls, and handles
- Signage
- Vending machines (non-food contact only)

Other

- Play area equipment (indoor only): bars, handles, chains, push plates, handrails, stair rails and risers, wheels, knobs, flooring
- Chapel pews
- Eye glass frames and protective eye wear
- Pens
- Combs
- Ashtrays

Do not wax, paint, lacquer, varnish, or otherwise coat touch surfaces.

NOTIFICATION
Date Reviewed: 8/20/12
Reviewed By: E. Gentry



CuVerro® III – Fabricated Products

The CuVerro® III fabricated products listed above may be sold and distributed under EPA Registration Number 85353-3. Products fabricated with CuVerro® III Antimicrobial Copper Alloys must bear the EPA approved fabricated product label, below, with one or more of the listed claims.

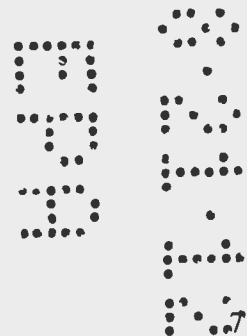
STORAGE AND DISPOSAL

Dispose of excess by recycling.

WARRANTY STATEMENT

If used as intended, this product is wear-resistant and the durable antibacterial properties will remain effective for as long as the product remains in place and is used as directed.

NOTIFICATION
Date Reviewed: 9/30/12
Reviewed By: R. LEAHY



CuVerro® III
Fabricated Product Label

FRONT

[This (touch surface) (product)] made from
CuVerro® III
Active Ingredient:
Copper82.6%
Other.....17.4%
[Total 100.0%]
See [Back/Side Panel][Insert] for Directions for Use
Net Weight: XXX lbs XXX ounces of CuVerro® III

BACK

CuVerro® III

Laboratory testing has shown that when cleaned regularly this surface:

- Continuously reduces bacterial* contamination, achieving 99.9% reduction within 2 hours of exposure.
 - Kills greater than 99.9% of Gram-negative and Gram-positive bacteria* within 2 hours of exposure.
 - Delivers continuous and ongoing antibacterial* action, remaining effective in killing greater than 99.9% of bacteria* within 2 hours.
 - Kills greater than 99.9% of bacteria* within two hours and continues to kill 99% of bacteria* even after repeated contaminations.
 - Helps inhibit the buildup and growth of bacteria* within 2 hours of exposure between routine cleaning and sanitizing steps.
 - [This product/component name] is made (out of)(from) a (copper)(touch) surface that continuously kills bacteria left behind [by dirty hands][on the surface] killing more than 99.9% of bacteria* within 2 hours.
- * *Staphylococcus aureus*, *Enterobacter aerogenes*, Methicillin-Resistant *Staphylococcus aureus* (MRSA), *Escherichia coli* O157:H7, *Pseudomonas aeruginosa* and, Vancomycin – Resistant *Enterococcus faecalis* (VRE).

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Proper Care and Use. Clean and sanitize according to standard practice. Healthcare facilities must maintain the product in accordance with infection control guidelines. The use of this surface is a supplement to and not a substitute for standard infection control practices; users must continue to follow all current infection control practices, including those practices related to cleaning and disinfection of environmental surfaces. This surface has been shown to reduce microbial contamination, but does not necessarily prevent cross contamination.

This surface may be subject to recontamination and the level of active bacteria at any time will depend on the frequency and timing of recontamination and cleanliness of the surface (among other factors). In order to have proper antimicrobial effect, this product must be cleaned and maintained according to the directions for use.

Do not wax, paint, lacquer, varnish, or otherwise coat this product.

Routine cleaning to remove dirt and filth is necessary for good sanitation and to assure the effective antibacterial performance of this surface. Cleaning agents typically used for traditional hard, non-porous touch surfaces are permissible. The appropriate cleaning agent depends on the type of soiling and the measure of sanitization required. Normal tarnishing or wear of this surface will not impair antibacterial effectiveness.

Not approved for direct food contact or food packaging uses.

[Items exposed to outdoor environmental conditions are not representative of indoor laboratory test conditions, and, therefore, may impart reduced efficacy if not cleaned when visibly soiled.]

STORAGE AND DISPOSAL

Dispose of by recycling or put in trash.

WARRANTY STATEMENT

If used as intended, this product is wear-resistant and the durable antibacterial properties will remain effective for as long as the product remains in place and is used as directed.

EPA Reg. No. 85353-3

EPA Est. No. [Product Manufacturer Number] 85353-XX

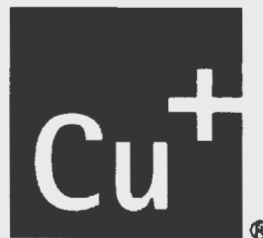
Manufactured by: [Product Manufacturer Company Name and Address]

Global Brass and Copper, Inc. 427 North Shamrock Street East Alton, IL 62024

NOTIFICATION
Date Reviewed: 7/30/12
Reviewed By: K. Barry

[Optional Logos for Use with Alloy Label or Fabricated Product Label]

Antimicrobial
Copper



CuVerro®

CuVerro®

Antimicrobial Copper Surfaces

NOTIFICATION
Date Reviewed: 9/20/12
Reviewed By: K. L. H. N. Y.

		United States Environmental Protection Agency Washington, DC 20460		<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
Application for Pesticide – Section I					
1. Company/Product Number 85353-3		2. EPA Product Manager Marshall Swindell		3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted	
4. Company/Product (Name) CuVerro® III		PM# 33			
5. Name And Address Of Applicant (Include ZIP Code) Global Brass and Copper, Inc. 427 North Shamrock Street East Alton, Illinois 62024 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____			
Section II					
<input type="checkbox"/> Amendment – Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification – Explain below.		<input type="checkbox"/> Final Printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other – Explain Below.			
Explanation: Use additional page(s) if necessary. (For section I and Section II.) Submission of Label Notification to add marketing logos. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA. Please confirm receipt with Micah Reynolds: mreynolds@tsgusa.com, phone (202) 828-8967, or fax (202) 872-0745.					
Section III					
1. Material This Product Will Be Packaged In:					
Child Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per Container	If "Yes" Unit Packaging wgt. No. per Container		
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(S) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product		<input type="checkbox"/> Lithographed <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____	
Section IV					
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Micah T. Reynolds, Technology Sciences Group, Inc.		Title Regulatory Consultant		Telephone No. (Include Area Code) (202) 828-8967	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.				6. Date Application Received (Stamped) 	
2. Signature 		3. Title Regulatory Consultant to Global Brass and Copper, Inc.			
4. Typed Name Micah T. Reynolds		5. Date August 20, 2012			



Technology Sciences Group Inc.

1150 18th Street, Suite 1000
Washington, DC 20036
Direct: (202) 828-8967
Fax: (202) 872-0745
E-Mail: MReynolds@TSGUSA.com

Micah T. Reynolds
Regulatory Consultant

August 20, 2012

Global Brass and Copper, Inc.
Label Notification for CuVerro® III;
EPA Reg. No. 85353-3

Mr. Marshall Swindell, PM-33
Antimicrobials Division (7504P)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Document Processing Center
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202

Dear Mr. Swindell:

Technology Sciences Group, Inc., on behalf of Global Brass and Copper, Inc., is submitting the enclosed label notification to add several optional marketing logos for use on the copper alloy product label and/or the fabricated product label. Conventionally, a redline version of the revised label (showing changes made) would be provided; however, since only the logo has been added (creating a ninth page of the label) with no other changes, a redline label was not produced. Please find enclosed the following documents supporting this notification:

- 1) Application for Notification (EPA Form 8570-1);
- 2) Three (3) copies of revised product labeling.

If you have any questions or require additional information or clarification, please do not hesitate to contact me by phone at (202) 828-8967 or by e-mail at mreynolds@tsgusa.com.

Sincerely,

Regulatory Consultant to
Global Brass and Copper, Inc.

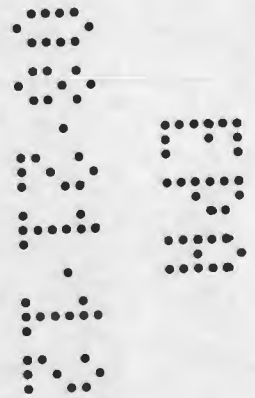
Enclosures

CC: M. Visnack (Global Brass and Copper, Inc.)

Washington, D.C.
1150 18th St., NW, Suite 1000
Washington, D.C. 20036
Phone: (202) 223-4392

California
712 Fifth St., Suite A
Davis, CA 95616
Phone: (530) 757-1245

Canada
275 Slater St., Suite 900
Ottawa, Ontario K1P 5H9
Phone: (613) 247-6285





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Global Brass and Copper, Inc.
427 North Shamrock Street
East Alton, IL 62024

JUL 22 2011

Attention: Heather Bjornson
Senior Regulatory Consultant

Subject: CuVerro III – Notification to correct supplier address
EPA Reg. No. 85353-3
Notification Application Dated July 6, 2011

This will acknowledge receipt of your notification for the aforementioned product label, submitted under the provisions of Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) Section 3© (9). Based on a review of the submitted material, the following apply:

- The Agency accepts the notification updating the address for [REDACTED] on the Confidential statement of Formula.

The Notification is in compliance with PR Notice 98-10 and is acceptable. This information has been made a part of your file.

If you have any questions concerning this letter, please contact Abigail Downs at (703) 305-5259.

Sincerely,

A handwritten signature in black ink, which appears to read "M. Swindell", is written over the typed name.

Marshall Swindell
Product Manager (33)
Regulatory Management Branch I
Antimicrobials Division (7510P)



Technology Sciences Group Inc.
1150 18th Street, NW, Suite 1000
Washington, D.C. 20036
Direct: (202) 828-8945
Fax: (202) 872-0745
E-Mail: hbjornson@tsgusa.com

Heather R. Bjornson
Senior Regulatory Consultant

CONTAINS CONFIDENTIAL BUSINESS INFORMATION

Marshall Swindell PM 33
Office of Pesticide Products, US EPA
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

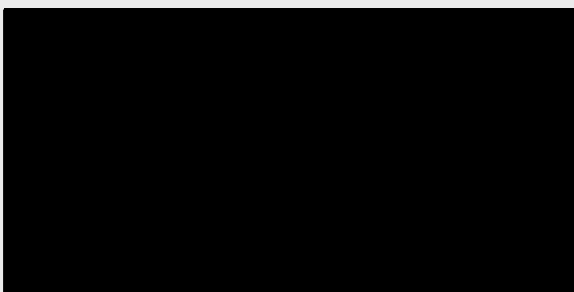
July 6, 2011

RE: Global Brass and Copper, Inc.: CuVerro® I (EPA Reg. No. 85353-1); CuVerro® II (EPA Reg. No. 85353-2); CuVerro® III (EPA Reg. No. 85353-3); CuVerro® IV (EPA Reg. No. 85353-4); CuVerro® V (EPA Reg. No. 85353-5)

Confidential Statement of Formula Notification to Update a Supplier's Address

Dear Mr. Swindell:

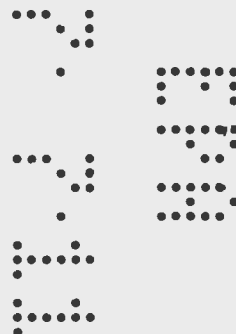
Technology Sciences Group Inc., on behalf of Global Brass and Copper, Inc., is submitting the enclosed notification to update the address for [REDACTED], a product producer.



Should you have any questions or comments, please do not hesitate to contact me directly.

Sincerely,

Heather R. Bjornson



Washington, D.C.
1150 18th St., NW, Suite 1000
Washington, D.C. 20036
Phone: (202) 223-4392

California
712 Fifth St., Suite A
Davis, CA 95616
Phone: (530) 757-1245

Canada
275 Slater St., Suite 900
Ottawa, Ontario K1P 5H9
Phone: (613) 247-6285



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 85353-3	2. EPA Product Manager Marshall Swindell	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) CuVerro III	PM# 33	
5. Name and Address of Applicant (Include ZIP Code) Global Brass and Copper Inc. 427 North Shamrock Street East Alton, IL 62024 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

This label notification is to correct the address of a supplier on the CSF per PR Notice 98-10.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input checked="" type="checkbox"/> Other (Specify) _____	none
* Certification must be submitted					
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container NA-no container		5. Location of Label Directions <input checked="" type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input checked="" type="checkbox"/> Other Attached to bill of lading			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Heather R. Bjornson	Title Senior Regulatory Consultant	Telephone No. (Include Area Code) (202) 828-8945
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Regulatory Consultant to Global Brass and Copper	
4. Typed Name Heather R. Bjornson	5. Date July 6, 2011	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

MAY 25 2011

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Ms. Heather Bjornson
Regulatory Consultant for,
c/o Global Brass and Copper, Inc.
1150 18th Street, N.W.
Suite 1000
Washington, D.C. 20036

Subject: Cuverro III
EPA Registration Number 85353-3
Your Notification Dated April 25, 2011
EPA Received Date April 25, 2011

The notification referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act(FIFRA), as amended, to add the additional brand name, "CuVerro III Antimicrobial Copper Alloy", acceptable.

The notification has been made part of the file.

If you have any questions concerning this letter, please contact Karen M. Leavy-Munk at (703)-308-6237.

Sincerely,

A handwritten signature in cursive script, appearing to read "M. Swindell".

Marshall Swindell
Product Manager 33
Regulatory Management Branch I
Antimicrobial Division(7510P)



Technology Sciences Group Inc.

1150 18th Street, Suite 1000
Washington, DC 20036
Direct: (202) 828-8967
Fax: (202) 872-0745
E-Mail: MReynolds@TSGUSA.com

Heather R. Bjornson
Senior Regulatory Consultant

April 25, 2011

Global Brass and Copper, Inc.
Notification for CuVerro® 3
EPA Reg. No. 85353-3

Mr. Marshall Swindell, PM-33
Antimicrobials Division (7504P)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Document Processing Center
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202

Dear Mr. Swindell:

Technology Sciences Group, Inc., on behalf of Global Brass and Copper, Inc., is submitting the enclosed application for a notification to the above referenced product containing antimicrobial copper alloys. This notification is to add the alternate brand name "CuVerro® III Antimicrobial Copper Alloy" to the label.

Please find enclosed the following documents supporting this amendment action:

- 1) Notification application form,
- 2) One redline versions of the label, and
- 3) One clean copy of the label.

Sincerely,

Senior Regulatory Consultant to
Global Brass and Copper, Inc.

Washington, D.C.
1150 18th St., NW, Suite 1000
Washington, D.C. 20036
Phone: (202) 223-4392

California
712 Fifth St., Suite A
Davis, CA 95616
Phone: (530) 757-1245

Canada
275 Slater St., Suite 900
Ottawa, Ontario K1P 5H9
Phone: (613) 247-6285



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 85353-3	2. EPA Product Manager Marshall Swindell	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) CuVerro III	PM# 33	
5. Name and Address of Applicant (Include ZIP Code) Global Brass and Copper Inc. 427 North Shamrock Street East Alton, IL 62024 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

This label notification is to add an alternate brand name and to make minor text revisions per PR Notice 98-10.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input checked="" type="checkbox"/> Other (Specify) _____	none
* Certification must be submitted					
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container NA-no container		5. Location of Label Directions <input checked="" type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper, glued <input type="checkbox"/> Stenciled		<input checked="" type="checkbox"/> Other Attached to bill of lading			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Heather R. Bjornson		Title Senior Regulatory Consultant	
		Telephone No. (Include Area Code) (202) 828-8945	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			
2. Signature 		3. Title Regulatory Consultant to Global Brass and Copper	
4. Typed Name Heather R. Bjornson		5. Date April 25, 2011	
6. Date Application Received (Stamped)			



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Mr. Micah T. Reynolds
Regulatory Consultant for,
c/o Global Brass & Copper, Inc.
TSG, Inc.
1150 15th Street, N.W.
Suite 1000
Washington, D.C. 20036

MAR - 1 2011

Subject: CuVerro III
EPA Registration Number 85353-3
Your Amendment Dated December 16th, 2010
EPA Received Date December 16th, 2010

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, FIFRA, as amended, to revise the product labeling which also includes a fabricated product label is acceptable subject to the comments listed below:

- 1) The fabricator cannot make claims about the basic copper alloy product or ingredient or fabricated article (doorknock, handrail, etc.) that conflict with statements required pursuant to FIFRA on either the basic copper alloy product or any fabricated product label. For example, the accepted master label for the basic copper alloy as well as the label for the fabricated product that is included within the master label state "Normal tarnishing or wear of the surface will not impair antibacterial effectiveness." Additionally, in support of your application for re-registration of the basic copper alloy products, you submitted data supporting your position that tarnish has a beneficial impact on product efficacy against target microorganisms. Hence, the warranty statement, for example, on either the basic copper alloy product or any fabricated product cannot make a non-tarnish claim as that would conflict with the above required label statement.

- 2) The EPA Establishment Number that appears on the labeling for the alloy product labeling and/or the labeling for the fabricated end-use article to being sold or distributed must be that of the establishment where the particular product it is being produced and labeled. For the alloy product, it would be the establishment where the alloy product is produced and labeled. For the fabricated end-use article, it would be the establishment where the fabricated end-use article is produced and labeled. It is the responsibility of the owner of the establishment where the final production takes place to report production, and to maintain books and records under FIFRA Sections 7 and 8 and 40CFR 167 and 169.
- 3) The labels attached to the copper alloy and the end-use fabricated products must contain the name and address of the producer, registrant, or person for whom produced in accordance with 40 CFR 156.10(c).
- 4) The registration record will reflect the product name change as follows:

Old Product Name: Copper Shield 82
New Product Name: CuVerro III

A stamped copy of the labeling is enclosed for your records.

If you have questions concerning this letter, please contact Karen M. Leavy at (703)-308-6237.

Sincerely,

Marshall Swindell
Product Manager 33
Regulatory Management Branch I
Antimicrobials Division(7510P)

**CuVerro® III
AND ASSOCIATED FABRICATED PRODUCTS
MASTER LABEL**

The Master Label consists of the label that will accompany the CuVerro® III Antimicrobial Alloys and a label that will accompany each product fabricated using a registered CuVerro® III alloy.

[Alloy Label – Front Panel]

**CuVerro® III
AND ASSOCIATED FABRICATED PRODUCTS**

Active Ingredient:

Copper	82.6%
Other	17.4%
Total	100%

EPA Registration No. 85353-3
EPA Establishment No. 85353-XX

Made in the United States by:
Global Brass and Copper, Inc.
427 N. Shamrock Street
East Alton, IL 62024

Net Weight: XXX lbs XXX ounces of CuVerro® III

**ACCEPTED
with COMMENTS
EPA Letter Dated:**

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. **85353-3**

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

CuVerro® III Antimicrobial Copper Alloys

These alloys are only intended for the manufacture and fabrication of touch surface components for use in hospitals, healthcare facilities, and various public, commercial, and residential buildings. [The claims listed on the attached fabricated product label may be made in connection with the marketing and sale of CuVerro® III Antimicrobial Copper Alloys and fabricated products made from CuVerro® III Antimicrobial Copper Alloys under EPA Registration Number 85353-3.

A list of components that may be fabricated out of CuVerro® III Antimicrobial Copper Alloys is specified below. CuVerro® III Antimicrobial Copper Alloys are not approved for direct food contact or food packaging uses.

Touch Surface Components

Healthcare Facilities

- Bedrails, footboards
- Over-bed tables
- Bed-side tables in hospitals, extended care facilities, senior housing etc. (knobs, pulls, handles; surfaces)
- Handrails, (corridor/hallways) (Senior housing), automatic door push plates
- Stair rails, handrails, tubular railing, and supports, rail fittings, T's, elbows and brackets
- Bedrails, assistance rails,
- Toilet safety rails
- Carts

Hospital carts (table surfaces, handles, legs)
Computer carts
Record carts
Phlebotomy carts

Other Carts (tables/surfaces, shelving, railings, handles, pulls)

- Equipment carts (horizontal surfaces, frames, handles)
- Door push plates, kick plates, mop plates, stretcher plates
- Sinks: spigots, drains, sinks themselves
- Faucet: handles, spigot, drain control lever
- Water fountains: bubbler head, drain strainer, handle
- Alcohol sanitizer dispenser, handle
- Paper towel holders, facial tissue holders, toilet paper holders
- Air hand dryer, controls and push buttons on air hand dryers
- Hydrotherapy tanks (whirlpool tanks): shells, covers, headrests, drain fittings (outer surfaces without water contact)
- Door handles, doorknobs (outer touch surfaces)
- Grab bars in bathrooms showers and bathtubs
- Panic bars on emergency room doors

ACCEPTED
with COMMENTS
EPA Letter Dated:
MAR 1 2011
Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 85353-3

- Towel bars
- Showerheads
- Countertops and tabletops (non-food use only)
- Hinges, locks, latches, and trim
- Door stops, door pulls, and protector guards
- Toilet and urinal hardware, levers, push buttons
- Toilet seat inlay for lifting of seat
- Closures
- Vertical locking arms
- Vertical cover guards
- Protection bars
- Light switches, switch plates
- Visitor chairs: armrests, metal frames
- Thermostat covers, control knobs and wheels
- Telephone handsets and surfaces (housings), keypad
- Kitchen surfaces (non-food contact only): table tops, counter tops, handles (microwave, refrigerator, stove), cabinet doors, cabinet hinges, pulls, backsplash, hoods, control knobs (appliances, fans)
- Floor tiles
- Ceiling tiles (non-porous)
- Wall tiles
- Instrument handles

Medical equipment knobs, pulls and handles for:

- Drug delivery systems
- Monitoring systems
- Hospital beds
- Office equipment
- Operating room equipment
- Stands and fixtures

Types of knobs: *e.g.*, Prong, fluted, knurled, push/pull, T-handle, tapered, and ball knobs

- Intravenous (IV) poles, bases, hangers, clips
- Trays (instruments, non-food contact)
- Pans (bed)
- Walkers, wheelchair handles, and tubular components
- Computer keyboards: keys, housings, computer mouse surfaces
- Exercise and rehabilitation equipment, handles, bars
- Physical therapy equipment: physical therapy tables, treatment chairs and portable taping tables
- Chairs (shower chairs, patient chairs, visitor chairs): rails, backs, legs, seats
- Lighting products: X-ray illuminators, operating rooms, patient examination rooms, surgical suites, and reading lamps for hospital rooms and assisted living facilities etc. Components can include bases, arms, housings, handles, hinges)
- Headwall systems: the unit themselves, outlet covers, knobs and dials, lighting units (lamp housings and adjustable arms), CRT monitors with rotating knobs and levers and adjustments. Baskets, monitor housings, knobs, baskets, tables, IV poles

ACCEPTED
with COMMENTS
EPA Letter Dated:

MAR - 1 2011

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 85353-3

- Critical care cart: Table top, drawer, drawer pull, lock, copper wire baskets for storage of equipment and charts.
- Bedside lavatory: sink, faucet, handles, drawer pulls, toilet seat, toilet seat cover, toilet handle, door and cabinet facings, counter tops
- Medical records: Chart holders, clipboards, filing systems
- Storage Shelving: wire shelving etc. for medical supplies
- Grab handles on privacy curtains
- Lids of laundry hampers, trash canisters, and other containers
- Bedside pitchers
- Closet rods and hangers
- Television controls: knobs, buttons, remote
- Monitor (television, computer, etc.) housing
- Cup Holder
- Toothbrush holder
- Soap holder
- Magazine rack
- Signage
- Coat rack and hooks
- Shower curtain rings
- Radiator cover
- Bracelets
- Pens
- Badge clips
- Name tags
- Patient gown snaps
- Window sills, pulls and locks
- Electrical wallplates

ACCEPTED
with COMMENTS
EPA Letter Dated:

MAR 1 2011

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 85353-3

Community Facilities (including various public and commercial buildings)

- Shopping cart handles, child seats, handrails
- Cash registers: housing, keypads
- ATM machines: keys, housing
- Gym/Health club lockers, locker handles, locker shelving, trainers' tables,
- Ice and water dispensers (outer surfaces without water contact)
- Elevator: handrail, control panel, buttons, interior walls, floor tiles, exterior call button plate
- Paper towel dispensers. Housing itself, (turn) handle, (push) handle
- Soap holder
- Soap dispenser (wall mounted): push bar and dispenser itself
- Soap dispenser (sitting on counter): dispenser housing itself, push mechanism
- Toilet paper dispenser (housing)
- Windows (crank), Locking mechanism, pull handles
- Window treatments (cord pulls), Venetian blinds (wands, cord pulls)
- Jalousie Windows (crank)
- Casement (cranks, levers, hinges)
- Single and double-hung windows (locks and pulls)
- Light switches, switch plates

- Lids of laundry hampers, trash canisters, and other containers
- Magazine rack
- Signage
- Coat rack and hooks
- Shower curtain rings
- Radiator cover
- Bracelets
- Badge clips
- Name tags
- Vending machines (non-food contact only)
- Window sills
- Electrical wallplates
- Clip boards
- Office supplies: paper clips, staplers, tape dispensers

Residential Buildings (including homes, apartments, apartment buildings and other residences)

- Kitchen surfaces (non-food contact only): table tops, counter tops, handles (microwave, refrigerator, stove), cabinet doors, cabinet hinges, pulls, backsplash, hoods, control knobs (appliances, fans)
- Bedrails, footboards
- Handrails
- Stair rails
- Door push plates
- Sinks: spigots, drains, sinks themselves
- Faucet: handles, spigot, drain control lever
- Paper towel holders, facial tissue holders, toilet paper holders
- Door handles, doorknobs (outer touch surfaces)
- Grab bars in bathrooms showers and bathtubs
- Towel bars
- Showerheads
- Countertops and tabletops
- Hinges, locks, latches, and trim
- Door stops, door pulls, and protector guards
- Toilet and urinal hardware, levers, push buttons
- Toilet seat inlay for lifting of seat
- Light switches, switch plates
- Thermostat covers, control knobs and wheels
- Telephone handsets and surfaces (housings), keypad
- Floor tiles
- Ceiling tiles (non-porous)
- Wall tiles
- Computer keyboards: keys, housings, computer mouse surfaces
- Exercise equipment, handles, bars
- Windows (crank), Locking mechanism, pull handles
- Window treatments (cord pulls), Venetian blinds (wands, cord pulls)
- Jalousie Windows (crank)

ACCEPTED
with COMMENTS
EPA Letter Dated:
MAR 1 2011

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 85353-3

- Casement (cranks, levers, hinges)
- Single and double-hung windows (locks and pulls)
- Television control knobs and buttons
- Lids of laundry hampers, trash canisters, and other containers
- Bedside pitchers
- Closet rods and hangers
- Television remote
- Cup Holder
- Toothbrush holder
- Soap holder
- Magazine rack
- Coat rack and hooks
- Shower curtain rings
- Radiator cover
- Window sills
- Electrical wallplates
- Baby cribs: rails, fittings, brackets, supports
- Bowl stands
- Office supplies: paper clips, staplers, tape dispensers
- Monitor (television, computer, etc.) housing

ACCEPTED
with COMMENTS
EPA Letter Dated:

MAR 1 2011

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 85353-3

Mass Transit Facilities

- Handrails
- Stair rails, tubular railing, and supports; elbows and brackets
- Door push plates, kick plates
- Door handles, door knobs (outer touch surfaces)
- Grab bars and handles
- Tiles: wall, floor, ceiling (non-porous)
- Chairs and benches: rails, backs, legs, seats
- Window sills, pulls, and handles
- Signage
- Vending machines (non-food contact only)

Other

- Play area equipment (indoor only): bars, handles, chains, push plates, handrails, stair rails and risers, wheels, knobs, flooring
- Chapel pews
- Eye glass frames and protective eye wear
- Pens
- Combs
- Ashtrays

Do not wax, paint, lacquer, varnish, or otherwise coat touch surfaces.

CuVerro® III – Fabricated Products

The CuVerro® III fabricated products listed above may be sold and distributed under EPA Registration Number 85353-3. Products fabricated with CuVerro® III Antimicrobial Copper Alloys must bear the EPA approved fabricated product label, below, with one or more of the listed claims.

STORAGE AND DISPOSAL

Dispose of excess by recycling.

WARRANTY STATEMENT

If used as intended, this product is wear-resistant and the durable antibacterial properties will remain effective for as long as the product remains in place and is used as directed.

ACCEPTED
with COMMENTS
EPA Letter Dated:

MAR 1 2011

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 85353-3

CuVerro® III

Fabricated Product Label

FRONT

[This (touch surface) (product)] made from
CuVerro® III
Active Ingredient:
Copper82.6%
Other.....17.4%
[Total 100.0%]
See [Back/Side Panel][Insert] for Directions for Use
Net Weight: XXX lbs XXX ounces of CuVerro® III

ACCEPTED
with COMMENTS
EPA Letter Dated:

MAR 1 2011

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 85353-3

BACK

CuVerro® III

Laboratory testing has shown that when cleaned regularly this surface:

- Continuously reduces bacteria* contamination, achieving 99.9% reduction within 2 hours of exposure.
- Kills greater than 99.9% of Gram-negative and Gram-positive bacteria* within 2 hours of exposure.
- Delivers continuous and ongoing antibacterial* action, remaining effective in killing greater than 99.9% of bacteria* within 2 hours.
- Kills greater than 99.9% of bacteria* within two hours and continues to kill 99% of bacteria* even after repeated contaminations.
- Helps inhibit the buildup and growth of bacteria* within 2 hours of exposure between routine cleaning and sanitizing steps.
- [This product/component name] is made (out of)(from) a (copper)(touch) surface that continuously kills bacteria left behind [by dirty hands][on the surface] killing more than 99.9% of bacteria within 2 hours.

* *Staphylococcus aureus*, *Enterobacter aerogenes*, Methicillin-Resistant *Staphylococcus aureus* (MRSA), *Escherichia coli* O157:H7, *Pseudomonas aeruginosa* and, Vancomycin – Resistant *Enterococcus faecalis* (VRE).

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Proper Care and Use. Clean and sanitize according to standard practice. Healthcare facilities must maintain the product in accordance with infection control guidelines. The use of this surface is a supplement to and not a substitute for standard infection control practices; users must continue to follow all current infection control practices, including those practices related to cleaning and disinfection of environmental surfaces. This surface has been shown to reduce microbial contamination, but does not necessarily prevent cross contamination.

This surface may be subject to recontamination and the level of active bacteria at any time will depend on the frequency and timing of recontamination and cleanliness of the surface (among other factors). In order to have proper antimicrobial effect, this product must be cleaned and maintained according to the directions for use.

Do not wax, paint, lacquer, varnish, or otherwise coat this product.

Routine cleaning to remove dirt and filth is necessary for good sanitation and to assure the effective antibacterial performance of this surface. Cleaning agents typically used for traditional hard, non-porous touch surfaces are permissible. The appropriate cleaning agent depends on the type of soiling and the measure of sanitization required. Normal tarnishing or wear of this surface will not impair antibacterial effectiveness.

Not approved for direct food contact or food packaging uses.

[Items exposed to outdoor environmental conditions are not representative of indoor laboratory test conditions, and, therefore, may impart reduced efficacy if not cleaned when visibly soiled.]

STORAGE AND DISPOSAL

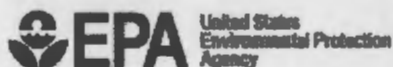
Dispose of by recycling or put in trash.

WARRANTY STATEMENT

If used as intended, this product is wear-resistant and the durable antibacterial properties will remain effective for as long as the product remains in place and is used as directed.

EPA Reg. No. 85353-3 EPA Est. No. [Product Manufacturer Number]- 85353-XX
Manufactured by: [Product Manufacturer Company Name and Address]
Global Brass and Copper, Inc. 427 North Shamrock Street East Alton, IL 62024

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



Office of Pesticide Programs

Antimicrobials Division (AD)

February 9, 2011

DP BARCODE:	D385240
MRID :	
SUBJECT:	Copper Shield 82
REG. NO. OR FILE SYMBOL:	85353-3
DOCUMENT TYPE:	Product Chemistry Review
Manufacturing-use <input type="checkbox"/> OR	End-use Product <input checked="" type="checkbox"/>
INGREDIENTS (PC Codes)	Copper (022501)
CAS number:	7440-50-8
TEST LAB:	
SUBMITTER:	Global Brass & Copper, Inc.
GUIDELINE:	
COMMODITIES:	Formulation
REVIEWER:	Juan F. Negrón
ORGANIZATION:	AD
APPROVER:	Karen P. Hicks
APPROVED DATE:	02/09/11
COMMENT:	The registrant changed the product name from "Copper Shield 82" to "CuVerro® III."

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



Office of Pesticide Programs

Antimicrobials Division (AD)

February 9, 2011

MEMORANDUM

Subject: Product Chemistry Review for EPA Reg # 85353-3.
Product name: Copper Shield 82
New product name: CuVerro® III
DP # 385240

From: Juan F. Negrón, Chemist
Product Science Branch, CT Team
Antimicrobials Division (7510P)

Thru: Karen P. Hicks, CT Team Leader
Product Science Branch
Antimicrobials Division (7510P)

To: Marshall Swindell / Demson Fuller
PM Team 33
Antimicrobials Division (7510P)

APPLICANT: Global Brass & Copper, Inc.
Action code: 362
Due date: 03/17/11

Product Formulation from label
Active Ingredient

% by wt.

Copper82.6

BACKGROUND:

On behalf of the registrant, Global Brass & Copper, Inc., the consultant, Technology Sciences Group, Inc., is submitting a fast-track amendment. The purpose of the amendment is to comply with the Cooper Development Association (CDA) and EPA for the basic registered product to enable the marketing of antimicrobial copper alloys and products fabricated from those 11 alloys. The Product Chemistry Reviewer has received the following documents:

- A letter, dated 12/16/10.
- A label dated 12/17/10 pin punched.
- Confidential Statements of Formula (CSFs), dated 10/22/08, 12/03/10, & 01/11/11, for the basic formulation.

FINDINGS:

1. The CSF, dated 10/22/08, for the basic formulation is for reference.
2. The registrant changed the product name from "Copper Shield 82" to "CuVerro® III."
3. The CSF, dated 12/03/10, for the basic formulation is obsolete.
4. The CSF, dated 01/11/11, for the basic formulation is revised.
5. The CSF and the label have the same nominal.
6. The registrant is adding new alloys as follows:

CONCLUSIONS:

The CSF, dated 01/11/11, for the basic formulation is acceptable.

 United States Environmental Protection Agency Washington, DC 20460		<input type="checkbox"/> Registration <input checked="" type="checkbox"/> Amendment <input type="checkbox"/> Other	OPP Identifier Number
Application for Pesticide – Section I			
1. Company/Product Number 85353-3		2. EPA Product Manager Marshall Swindell	
4. Company/Product (Name) CuVerro® III		3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted	
5. Name And Address Of Applicant (Include ZIP Code) Global Brass and Copper, Inc. 427 North Shamrock Street East Alton, Illinois 62024 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	
Section II			
<input checked="" type="checkbox"/> Amendment – Explain below. <input type="checkbox"/> Final Printed labels in response to Agency letter dated _____ <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Notification – Explain below. <input type="checkbox"/> Other – Explain Below.			
Explanation: Use additional page(s) if necessary. (For section I and Section II.) Submission of Fast-Track: Label Amendment to make Agency requested label changes, and Confidential Statement of Formula amendment to add additional alloys This amendment action is not subject to PRIA. Please confirm receipt with Micah Reynolds: mreynolds@tsqusa.com, phone (202) 828-8967, or fax (202) 872-0745.			
Section III			
1. Material This Product Will Be Packaged In:			
Child Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No * Certification must be submitted	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. Container	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. Container	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(S) Retail Container	
		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithographed <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____			
Section IV			
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Micah T. Reynolds, Technology Sciences Group, Inc.		Title Regulatory Consultant	
		Telephone No. (Include Area Code) (202) 828-8967	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamp)
2. Signature 		3. Title Regulatory Consultant to Global Brass and Copper, Inc.	
4. Typed Name Micah T. Reynolds		5. Date December 16, 2010	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

JUL 28 2010

Ms. Heather Bjornson
Regulatory Consultant for,
c/o Global Brass and Copper, Inc.
1150 18th Street, N.W.
Suite 1000
Washington, D.C. 20036

Subject: Copper Shield 82
EPA Registration Number 85353-3
Your Dated June 11th, 2010
EPA Received Date June 29th, 2010

The notification referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act(FIFRA), as amended, to clarify a claim for State registration(s), add component labeling and technical bulletin, is unacceptable.

Currently, the Agency is in the process of providing labeling guidance to CDA concerning its product labeling as well as its accompanying labeling. Upon approval of the proposed product labeling guidance, the Agency will review labeling notifications as well as accompanying labeling.

The notification has not been made part of the file

If you have any questions concerning this letter, please contact Karen M. Leavy-Munk at (703)-308-6237.

Sincerely,

A handwritten signature in cursive script, appearing to read "M. Swindell".

Marshall Swindell
Product Manager 33
Regulatory Management Branch I
Antimicrobial Division(7510P)



WASHINGTON

1150 18th Street, N.W.

Suite 1000

Washington, D.C. 20036

Telephone 202 223-4392

Fax 202 872-0745

Marshall Swindell
Karen Leavy
Antimicrobial Division
Office of Pesticide Programs, EPA
One Potomac Yard,
2777 South Crystal Drive
Arlington, VA 22202

June 11, 2010

RE: Copper Shield 82 (EPA Reg. No.85353-3)

Notification to add minor text revisions per PR Notice 98-10

SACRAMENTO

712 Fifth Street

Suite A

Davis, CA 95616

Telephone 530 757-1298

Fax 530 757-1299

Dear Marshall and Karen:

Technology Sciences Group, Inc., on behalf of Global Brass and Copper Inc., is submitting the enclosed notification to make minor text revisions per PR Notice 98-10. Specifically, we are clarifying a claim for the states and adding a component label and technical bulletin (to be used for marketing purposes). These changes are consistent with the Copper Development Association pending notifications.

Please do not hesitate to contact me with any questions regarding this notification via telephone (202) 828-8945 or via e-mail: hbjornson@tsgusa.com.

Sincerely,

Heather R. Bjornson
Regulatory Consultant to Global Brass and Copper, Inc.

CANADA

275 Slater Street

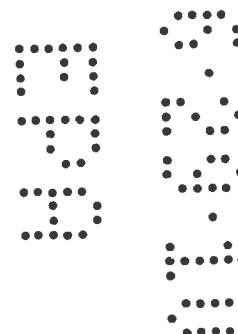
Suite 900

Ottawa, Ontario

K1P 5H9

Telephone 613 247-6285

Fax 613 236-3754



E-mail tsg@tsgusa.com

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United States
Environmental Protection Agency
Washington, DC 20460

Registration
Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 85353-3	2. EPA Product Manager Marshall Swindell	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Copper Shield 82	PM# 33	
5. Name and Address of Applicant (Include ZIP Code) Global Brass and Copper Inc. 427 North Shamrock Street East Alton, IL 62024 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

This label notification is to add a component label and technical bulletin and language to clarify a claim per PR Notice 98-10.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Heather R. Bjornson	Title Regulatory Consultant	Telephone No. (Include Area Code) (202) 828-8945	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 	3. Title Regulatory Consultant		
4. Typed Name Heather R. Bjornson	5. Date June 11, 2010		

Master Label containing:

Sublabel I. - Complete Label

Sublabel II. - Component Label and Technical Bulletin

Sublabel III: Optional Label Claims

Copper Shield 82

Alternate Brand Name: "CuVerroTM III,"

*NOTE: Product labels will bear the name of a copper alloy specified in the approved registration. Distributors may substitute a Product Brand Name in place of the name of the copper alloy on the label.

Active Ingredient:

Copper	82.6% [#]
Other	17.4% [#]

[#] Nominal percentages for purpose of review and approval. Actual percentage of copper and other ingredients will be indicated on labels distributed with the product.

Total	100%
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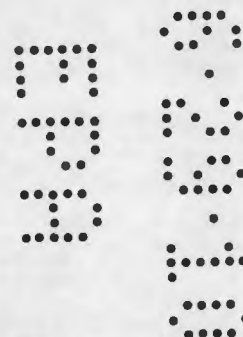
EPA Registration No. ****

Made in the United States by *****

EPA Establishment No. *****

Distributed by *****

Net Weight: XXX lbs XXX ounces of [brand name] Contents: *****



Sublabel I. Complete La'

Laboratory testing has shown that when cleaned regularly:

[This [product] [surface] continuously reduces bacterial* contamination, achieving 99.9% reduction within two hours of exposure.]

[This [product] surface kills greater than 99.9% of Gram-negative and Gram-positive bacteria* within two hours of exposure.]

[This [product] surface delivers continuous and ongoing antibacterial* action, remaining effective in killing greater than 99.9% of bacteria* within two hours, even after repeated wet and dry abrasion and re-contamination.]

[When cleaned regularly, this [product] surface kills greater than 99.9% of bacteria* within two hours, and continues to kill more than 99% of bacteria* even after repeated contamination.]

[This [product] surface helps inhibit the buildup and growth of bacteria* within two hours of exposure between routine cleaning and sanitizing steps.]

[This product is made (out of) (from) a (copper) (touch) surface that continuously kills bacteria left behind [by dirty hands][on the surface], killing more than 99.9% of bacteria within 2 hours.]

* Testing demonstrates effective antibacterial activity against *Staphylococcus aureus*, *Enterobacter aerogenes*, Methicillin-Resistant *Staphylococcus aureus* (MRSA), *Escherichia coli* O157:H7, and *Pseudomonas aeruginosa*.

The use of a copper surface is a supplement to and not a substitute for standard infection control practices; users must continue to follow all current infection control practices, including those practices related to cleaning and disinfection of environmental surfaces. The copper surface material has been shown to reduce microbial contamination, but it does not necessarily prevent cross contamination.

Active Ingredient:

<u>Copper</u>	<u>82.6%[#]</u>
<u>Other</u>	<u>17.4%[#]</u>

[#] Nominal percentages for purpose of review and approval. Actual percentage of copper and other ingredients will be indicated on labels distributed with the product.

<u>Total</u>	<u>100%</u>
--------------	-------------

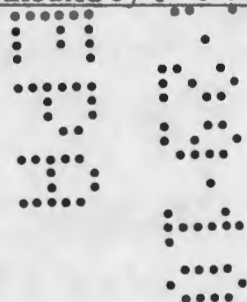
EPA Registration No. ****

Made in the United States by *****

EPA Establishment No. *****

Distributed by *****

Net Weight: XXX lbs XXX ounces of [brand name]



DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

[The directions in bracketed text below may be included in an insert. If so, there will be a statement to see the insert for additional directions for use of the product.]

[Directions for Use in the insert also may include installation and operation instructions, user manuals, and similar instructional materials appropriate for the end use product. No additional pesticidal claims will be made as part of these materials.]

Proper Care and Use of Copper Shield 82: The use of [antimicrobial copper surfaces] [this surface] does not replace standard infection control procedures and good hygienic practices. Surface[s] must be cleaned and sanitized according to standard practice. Health care facilities must maintain the product in accordance with infection control guidelines; users must continue to follow all current infection control practices, including those practices related to disinfection of environmental surfaces.

Surface[s] may be subject to recontamination and the level of active bacteria at any particular time will depend on the frequency and timing of recontamination and cleanliness of the surface (among other factors). In order for the surface to have proper antimicrobial effect, the product must be cleaned and maintained according to the directions included on this label.

This product must not be waxed, painted, lacquered, varnished, or otherwise coated.

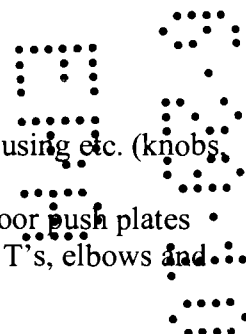
Routine cleaning to remove dirt and filth is necessary for good sanitation and to assure the effective antibacterial performance of the [antimicrobial] copper surface. Cleaning agents typically used for traditional touch [hard] surfaces are permissible; the appropriate cleaning agent depends on the type of soiling and the measure of sanitization required. [Normal tarnishing or wear of [antimicrobial] copper surfaces will not impair the antibacterial effectiveness of the product.]

This product can not be used for any direct food contact or food packaging uses.

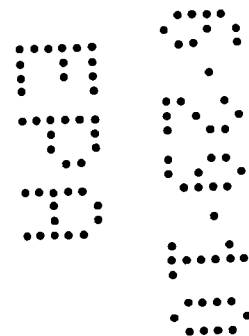
[This product may be used in hospitals, other healthcare facilities, and various public, commercial, and residential buildings for the non-food contact surfaces listed below.] [The following statement will appear on the label if the use involves potential exposure to outdoor conditions: Surfaces that may be exposed to outdoor environmental conditions (e.g., handrails, shopping carts, child seats and ATM machines) are not representative of indoor laboratory test conditions, and therefore, may impart reduced efficacy if not cleaned when visibly soiled.]

Healthcare Facilities

- Bedrails, footboards
- Over-bed tables
- Bed-side tables in hospitals, extended care facilities, senior housing etc. (knobs, pulls, handles; surfaces)
- Handrails, (corridor/hallways) (Senior housing), automatic door push plates
- Stair rails, handrails, tubular railing, and supports, rail fittings T's, elbows and brackets



- Bedrails, assistance rails,
- Toilet safety rails
- Carts
 - Hospital carts (table surfaces, handles, legs)
 - Computer carts
 - Record carts
 - Phlebotomy carts
 - Other Carts (tables/surfaces, shelving, railings, handles, pulls)
- Equipment carts (horizontal surfaces, frames, handles)
- Door push plates, kick plates, mop plates, stretcher plates
- Sinks: spigots, drains, sinks themselves
- Faucets: handles, spigot, drain control lever
- Water fountains: bubbler head, drain strainer, handle
- Alcohol sanitizer dispenser, handle
- Paper towel holders, facial tissue holders, toilet paper holders
- Air hand dryer, controls and push buttons on air hand dryers
- Hydrotherapy tanks (whirlpool tanks): shells, covers, headrests, drain fittings (outer surfaces without water contact)
- Door handles, doorknobs (outer touch surfaces)
- Grab bars in bathrooms showers and bathtubs
- Panic bars on emergency room doors
- Towel bars
- Showerheads
- Countertops and tabletops (non-food use only)
- Hinges, locks, latches, and trim
- Door stops, door pulls, and protector guards
- Toilet and urinal hardware, levers, push buttons
- Toilet seat inlay for lifting of seat
- Closures
- Vertical locking arms
- Vertical cover guards
- Protection bars
- Light switches, switch plates
- Visitor chairs: armrests, metal frames
- Thermostat covers, control knobs and wheels
- Telephone handsets and surfaces (housings), keypad
- Kitchen surfaces (non-food contact only): table tops, counter tops, handles (microwave, refrigerator, stove), cabinet doors, cabinet hinges, pulls, backsplash, hoods, control knobs (appliances, fans)
- Floor tiles
- Ceiling tiles (non-porous)
- Wall tiles
- Instrument handles
 - Medical equipment knobs, pulls and handles for:
 - Drug delivery systems
 - Monitoring systems
 - Hospital beds
 - Office equipment
 - Operating room equipment
 - Stands and fixtures

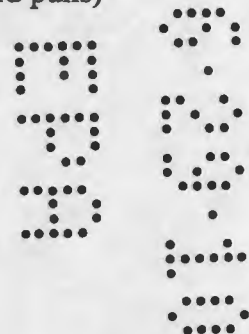


Types and observations: e.g., Prong, fluted, knurled, push, pull, T-handle, tapered, and ball knobs

- Intravenous (IV) poles, bases, hangers, clips
- Trays (instruments, non-food contact)
- Pans (bed)
- Walkers, wheelchair handles, and tubular components
- Computer keyboards: keys, housings, computer mouse surfaces
- Exercise and rehabilitation equipment, handles, bars
- Physical therapy equipment: physical therapy tables, treatment chairs and portable taping tables
- Chairs (shower chairs, patient chairs, visitor chairs): rails, backs, legs, seats
- Lighting products: X-ray illuminators, operating rooms, patient examination rooms, surgical suites, and reading lamps for hospital rooms and assisted living facilities etc. Components can include bases, arms, housings, handles, hinges)
- Headwall systems: the unit themselves, outlet covers, knobs and dials, lighting units (lamp housings and adjustable arms), CRT monitors with rotating knobs and levers and adjustments. Baskets, monitor housings, knobs, baskets, tables, IV poles
- Critical care cart: Table top, drawer, drawer pull, lock, copper wire baskets for storage of equipment and charts.
- Bedside lavatory: sink, faucet, handles, drawer pulls, toilet seat, toilet seat cover, toilet handle, door and cabinet facings, counter tops
- Medical records: Chart holders, clipboards, filing systems
- Storage Shelving: wire shelving etc. for medical supplies
- Grab handles on privacy curtains
- Lids of laundry hampers, trash canisters, and other containers

Community Facilities (including various public and commercial buildings)

- Shopping cart handles, child seats, handrails
- Cash registers: housing, keypads
- ATM machines: keys, housing
- Gym/Health club lockers, locker handles, locker shelving, trainers' tables,
- Ice and water dispensers (outer surfaces without water contact)
- Elevator: handrail, control panel, buttons, interior walls, floor tiles, exterior call button plate
- Paper towel dispensers. Housing itself, (turn) handle, (push) handle
- Soap holder
- Soap dispenser (wall mounted): push bar and dispenser itself
- Soap dispenser (sitting on counter): dispenser housing itself, push mechanism
- Toilet paper dispenser (housing)
- Windows (crank), Locking mechanism, pull handles
- Window treatments (cord pulls), Venetian blinds (wands, cord pulls)
- Jalousie Windows (crank)
- Casement (cranks, levers, hinges)
- Single and double-hung windows (locks and pulls)
- Light switches, switch plates
- Lids of laundry hampers, trash canisters, and other containers



Residential Buildings (including homes, apartments, apartment buildings and other residences)

- Kitchen surfaces (non-food contact only): table tops, counter tops, handles (microwave, refrigerator, stove), cabinet doors, cabinet hinges, pulls, backsplash, hoods, control knobs (appliances, fans)
- Bedrails, footboards
- Handrails
- Stair rails
- Door push plates
- Sinks: spigots, drains, sinks themselves
- Faucet: handles, spigot, drain control lever
- Paper towel holders, facial tissue holders, toilet paper holders
- Door handles, doorknobs (outer touch surfaces)
- Grab bars in bathrooms showers and bathtubs
- Towel bars
- Showerheads
- Countertops and tabletops
- Hinges, locks, latches, and trim
- Door stops, door pulls, and protector guards
- Toilet and urinal hardware, levers, push buttons
- Toilet seat inlay for lifting of seat
- Light switches, switch plates
- Thermostat covers, control knobs and wheels
- Telephone handsets and surfaces (housings), keypad
- Floor tiles
- Ceiling tiles (non-porous)
- Wall tiles
- Computer keyboards: keys, housings, computer mouse surfaces
- Exercise equipment, handles, bars
- Windows (crank), Locking mechanism, pull handles
- Window treatments (cord pulls), Venetian blinds (wands, cord pulls)
- Jalousie Windows (crank)
- Casement (cranks, levers, hinges)
- Single and double-hung windows (locks and pulls)
- Television control knobs and buttons
- Lids of laundry hampers, trash canisters, and other containers

Other

- Play area equipment (indoor only): bars, handles, chains, push plates, handrails, stair rails and risers, wheels, knobs, flooring

STORAGE AND DISPOSAL

Copper Shield 82 should be disposed in a responsible manner, including recycling.

WARRANTY STATEMENT

If used as intended, Copper Shield 82 is wear-resistant and the durable antibacterial properties will remain effective for as long as the product remains in place and is used as directed.

Made from

Copper Shield 82

Active Ingredient:

Copper82.6%

Other17.4%

Total100.0%

See Back Panel for Directions for Use

Net Weight: XXX lbs XXX ounces of
[brand name]

COPPER SHIELD 82

Laboratory testing has shown that when cleaned regularly:

- This surface continuously reduces bacteria* contamination, achieving 99.9% reduction within 2 hours of exposure.
- This surface kills greater than 99.9% of Gram-negative and Gram-positive bacteria* within 2 hours of exposure.
- This surface delivers continuous and ongoing antibacterial* action, remaining effective in killing greater than 99.9% of bacteria* within 2 hours.
- This surface kills greater than 99.9% of bacteria* within two hours and continues to kill 99% of bacteria* even after repeated contaminations.
- This surface helps inhibit the buildup and growth of bacteria* within 2 hours of exposure between routine cleaning and sanitizing steps.
- This product is made (out of)(from) a (copper)(touch) surface that continuously kills bacteria left behind [by dirty hands][on the surface] killing more than 99.9% of bacteria* within 2 hours.
- This product is made (out of)(from) a (copper)(touch) surface that continuously kills bacteria left behind [by dirty hands][on the surface] killing more than 99.9% of bacteria* within 2 hours.

* Testing demonstrates effective antibacterial activity against *Staphylococcus aureus*, *Enterobacter aerogenes*, Methicillin-Resistant *Staphylococcus aureus* (MRSA), *Escherichia coli* O157:H7, *Pseudomonas aeruginosa*.

The use of this product is a supplement to and not a substitute for standard infection control practices; users must continue to follow all current infection control practices, including those practices related to cleaning and disinfection of environmental surfaces. This surface has been shown to reduce microbial contamination, but it does not necessarily prevent cross contamination.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. **Proper Care and Use.** The use of this product does not replace standard infection control procedures and good hygienic practices. This product must be cleaned and sanitized according to standard practice. Healthcare facilities must maintain the product in accordance with infection control guidelines; users must continue to follow all current infection control practices, including those practices related to disinfection of environmental surfaces.

This surface may be subject to recontamination and the level of active bacteria at any particular time will depend on the frequency and timing of recontamination and cleanliness of the surface (among other factors). In order for this product to have proper antimicrobial effect, the product must be cleaned and maintained according to the directions included on this label.

This product must not be waxed, painted, lacquered, varnished, or otherwise coated.

Routine cleaning to remove dirt and filth is necessary for good sanitation and to assure the effective antibacterial performance of this surface. Cleaning agents typically used for traditional touching surfaces are permissible; the appropriate cleaning agent depends on the type of soiling and the measure of sanitization required. Normal tarnishing or wear of Antimicrobial Copper Alloy surfaces will not impair the antibacterial effectiveness of the product.

This product can not be used for any direct food contact or food packaging uses.

Surfaces that may be exposed to outdoor environmental conditions (e.g., handrails, shopping carts, child seats and ATM machines) are not representative of indoor laboratory test conditions, and therefore, may impart reduced efficacy if not cleaned when visibly soiled.

STORAGE AND DISPOSAL

Antimicrobial Copper Alloys Group I should be disposed in a responsible manner, including recycling.

WARRANTY STATEMENT

If used as intended, Antimicrobial Copper Alloys are wear resistant and the durable antimicrobial properties will remain effective for as long as the product remains in place and is used as directed.

EPA Reg. No. XXXXX-XX

EPA Est. No. XXXXX-XX-XXX

Manufactured by: Global Brass and Copper Inc. 427 North Shamrock St. East Alton, IL 62024

TECHNICAL BULLETIN

Copper Shield 82 EPA Reg. No. 85353-3

This product may be used in hospitals, other healthcare facilities, and various public, commercial and residential buildings for the non-food contact surfaces listed below.

Healthcare Facilities

- Bedrails, footboards
- Over-bed tables
- Bed-side tables in hospitals, extended care facilities, senior housing etc. (knobs, pulls, handles; surfaces)
- Handrails, (corridor/hallways) (Senior housing), automatic door push plates
- Stair rails, handrails, tubular railing, and supports, rail fittings T's, elbows and brackets
- Bedrails, assistance rails,
- Toilet safety rails
- Carts

Hospital carts (table surfaces, handles, legs)

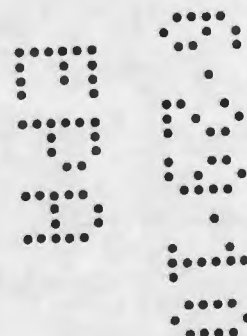
Computer carts

Record carts

Phlebotomy carts

Other Carts (tables/surfaces, shelving, railings, handles, pulls)

- Equipment carts (horizontal surfaces, frames, handles)
- Door push plates, kick plates, mop plates, stretcher plates
- Sinks: spigots, drains, sinks themselves
- Faucet: handles, spigot, drain control lever
- Water fountains: bubbler head, drain strainer, handle
- Alcohol sanitizer dispenser, handle
- Paper towel holders, facial tissue holders, toilet paper holders
- Air hand dryer, controls and push buttons on air hand dryers
- Hydrotherapy tanks (whirlpool tanks): shells, covers, headrests, drain fittings (outer surfaces without water contact)
- Door handles, doorknobs (outer touch surfaces)
- Grab bars in bathrooms showers and bathtubs
- Panic bars on emergency room doors
- Towel bars
- Showerheads
- Countertops and tabletops (non-food use only)
- Hinges, locks, latches, and trim
- Door stops, door pulls, and protector guards
- Toilet and urinal hardware, levers, push buttons
- Toilet seat inlay for lifting of seat
- Closures
- Vertical locking arms
- Vertical cover guards



- Protection
- Light switches, switch plates
- Visitor chairs: armrests, metal frames
- Thermostat covers, control knobs and wheels
- Telephone handsets and surfaces (housings), keypad
- Kitchen surfaces (non-food contact only): table tops, counter tops, handles (microwave, refrigerator, stove), cabinet doors, cabinet hinges, pulls, backsplash, hoods, control knobs (appliances, fans)
- Floor tiles
- Ceiling tiles
- Wall decorative tiles
- Instrument handles

Medical equipment knobs, pulls and handles for:

- Drug delivery systems
- Monitoring systems
- Hospital beds
- Office equipment
- Operating room equipment
- Stands and fixtures

Types of knobs: e.g. Prong, fluted, knurled, push/pull, T-handle, tapered, and ball knobs

- Intravenous (IV) poles, bases, hangers, clips
- Trays (instruments, non-food contact)
- Pans (bed)
- Walkers, wheelchair handles, and tubular components
- Computer keyboards: keys, housings, computer mouse surfaces
- Exercise and rehabilitation equipment, handles, bars
- Physical therapy equipment: physical therapy tables, treatment chairs and portable taping tables
- Chairs (shower chairs, patient chairs, visitor chairs): rails, backs, legs, seats
- Lighting products: X-ray illuminators, operating rooms, patient examination rooms, surgical suites, and reading lamps for hospital rooms and assisted living facilities etc. Components can include bases, arms, housings, handles, hinges)
- Headwall systems: the unit themselves, outlet covers, knobs and dials, lighting units (lamp housings and adjustable arms), CRT monitors with rotating knobs and levers and adjustments. Baskets, monitor housings, knobs, baskets, tables, IV poles
- Critical care cart: Table top, drawer, drawer pull, lock, copper wire baskets for storage of equipment and charts.
- Bedside lavatory: sink, faucet, handles, drawer pulls, toilet seat, toilet seat cover, toilet handle, door and cabinet facings, counter tops
- Medical records: Chart holders, clipboards, filing systems
- Storage Shelving: wire shelving etc. for medical supplies
- Grab handles on privacy curtains
- Lids of laundry hampers, trash canisters, and other containers

Community Facilities (including various public and commercial buildings)

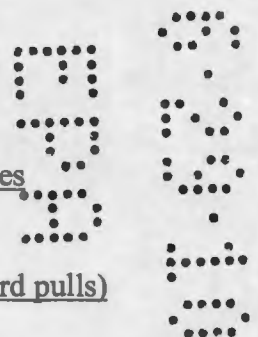
- Shopping cart handles, child seats, handrails
- Cash registers: housing, keypads



- ATM mac. s: keys, housing
- Gym/Health club lockers, locker handles, locker shelving, trainers' tables,
- Ice and water dispensers (outer surfaces without water contact)
- Elevator: handrail, control panel, buttons, interior walls, floor tiles, exterior call button plate
- Paper towel dispensers. Housing itself, (turn) handle, (push) handle
- Soap holder
- Soap dispenser (wall mounted): push bar and dispenser itself
- Soap dispenser (sitting on counter): dispenser housing itself, push mechanism
- Toilet paper dispenser (housing)
- Windows (crank), Locking mechanism, pull handles
- Window treatments (cord pulls), Venetian blinds (wands, cord pulls)
- Jalousie Windows (crank)
- Casement (cranks, levers, hinges)
- Single and double-hung windows (locks and pulls)
- Light switches, switch plates
- Lids of laundry hampers, trash canisters, and other containers

Residential Buildings (including homes, apartments, apartment buildings and other residences

- Kitchen surfaces (non-food contact only): table tops, counter tops, handles (microwave, refrigerator, stove), cabinet doors, cabinet hinges, pulls, backsplash, hoods, control knobs (appliances, fans)
- Bedrails, footboards
- Handrails
- Stair rails
- Door push plates
- Sinks: spigots, drains, sinks themselves
- Faucet: handles, spigot, drain control lever
- Paper towel holders, facial tissue holders, toilet paper holders
- Door handles, doorknobs (outer touch surfaces)
- Grab bars in bathrooms showers and bathtubs
- Towel bars
- Showerheads
- Countertops and tabletops
- Hinges, locks, latches, and trim
- Door stops, door pulls, and protector guards
- Toilet and urinal hardware, levers, push buttons
- Toilet seat inlay for lifting of seat
- Light switches, switch plates
- Thermostat covers, control knobs and wheels
- Telephone handsets and surfaces (housings), keypad
- Floor tiles
- Ceiling tiles
- Wall decorative tiles
- Computer keyboards: keys, housings, computer mouse surfaces
- Exercise equipment, handles, bars
- Windows (crank), Locking mechanism, pull handles
- Window treatments (cord pulls), Venetian blinds (wands, cord pulls)



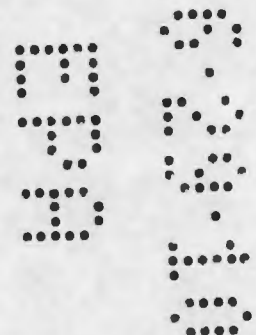
- Jalousie Windows (crank)
- Casement (cranks, levers, hinges)
- Single and double-hung windows (locks and pulls)
- Television control knobs and buttons
- Lids of laundry hampers, trash canisters, and other containers

Other

- Playground equipment (outdoor): bars, handles, chains, push plates, handrails, stair rails and risers, wheels, knobs, flooring

Surfaces that may be exposed to outdoor environmental conditions (e.g., handrails, shopping carts, child seats and ATM machines) are not representative of indoor laboratory test conditions, and therefore, may impart reduced efficacy if not cleaned when visibly soiled.]

Global Brass and Copper, Inc.
247 North Shamrock Street
East Alton, IL 62024



Optional Label Claims:

[Residential]

- Kills 99.9% of *Staphylococcus aureus*, *Escherichia coli* O157:H7, and *Pseudomonas aeruginosa*.
- This product kills *bacteria continuously.
- Kills bacteria continuously
- This product inhibits the growth of *Staphylococcus aureus*, *Escherichia coli* O157:H7, and *Pseudomonas aeruginosa* on its surface.
- Continuously kills bacteria on its surface
- Continuously reduces bacterial contamination
- Kills/eliminates/reduces germs/bacteria left behind (by dirty hands)
- Works even when you're sleeping.
- Provides On-Going Protection
- Continues to reduce/kill bacteria even when you don't have time to clean/disinfect

* Testing demonstrates effective antibacterial activity against *Staphylococcus aureus*, *Escherichia coli* O157:H7, and *Pseudomonas aeruginosa*.

[Industrial and Commercial]

- Kills 99.9% of *Staphylococcus aureus*, *Enterobacter aerogenes*, Methicillin-Resistant *Staphylococcus aureus* (MRSA), *Escherichia coli* O157:H7, and *Pseudomonas aeruginosa*.
- Kills *bacteria continuously.
- Inhibits the growth of *Staphylococcus aureus*, *Enterobacter aerogenes*, Methicillin-Resistant *Staphylococcus aureus* (MRSA), *Escherichia coli* O157:H7, and *Pseudomonas aeruginosa* on its surface.
- Continuously Reduces bacterial growth on this common touch surface
- Continuously kills bacteria left behind on this surface by users/the public/your customers.

* Testing demonstrates effective antibacterial activity against *Staphylococcus aureus*, *Enterobacter aerogenes*, Methicillin-Resistant *Staphylococcus aureus* (MRSA), *Escherichia coli* O157:H7, and *Pseudomonas aeruginosa*.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

NOV 6 2009



United States
Environmental Protection
Agency

Office of Pesticide Programs

Globe Brass and Copper Inc.
427 North Shamrock Street
East Alton, IL 62024

Attention: Amy Plato Roberts

Subject: Copper Shield 82
EPA Registration No. 85353-3
Notification Dated October 8, 2009

This will acknowledge receipt of your notification to add the following additional brand name, submitted under the provisions of FIFRA Section 3(c)(9). Based on a review of the submitted material, the following comments apply.

ADDITIONAL BRAND NAME

"CuVerro™ III"

The Notification is in compliance with PR Notice 98-10 and is acceptable. This information has been added to your product file.

If you have any questions concerning this letter, please contact Martha Terry at (703) 308-6217.

Sincerely

A handwritten signature in cursive script, appearing to read "Martha Terry" followed by a flourish.

Marshall Swindell
Product Manager (33)
Regulatory Management Branch 1
Antimicrobials Division (7510P)



WASHINGTON

1150 18th Street, N.W.

Suite 1000

Washington, D.C. 20036

Telephone 202 223-4392

Fax 202 872-0745

Marshall Swindell, PM 33
Regulatory Management Branch I
Antimicrobials Division (7510P)
Office of Pesticide Programs, EPA
One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

October 8, 2009

RE: Copper Shield 82; EPA Reg. No. 85353-3

Label NOTIFICATION to add an alternate brand name

SACRAMENTO

712 Fifth Street

Suite A

Davis, CA 95616

Telephone 530 757-1298

Fax 530 757-1299

Dear Mr. Swindell:

Enclosed with this letter you will find the following in support of a label NOTIFICATION, per PR Notice 98-10, to add an alternate brand name to the above referenced product:

- 1) Notification form;
- 2) One (1) copy of the label with all changes highlighted in red.

This label notification is to add the following alternate brand name:

"CuVerro^{III}"

No other changes are made to the product label at this time. If you have any questions or comments please contact Heather Bjornson [(202) 828-8945; hbjornson@tsqusa.com] directly.

CANADA

275 Slater Street

Suite 900

Ottawa, Ontario

K1P 5H9

Telephone 613 247-6285

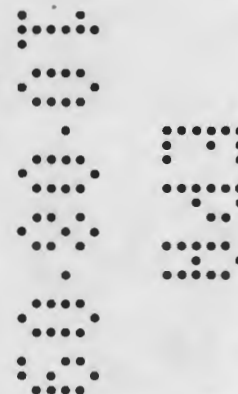
Fax 613 236-3754

Sincerely,

Amy Plato Roberts
Regulatory Consultant
Direct dial: (202) 828-8964; E-mail: aroberts@tsqusa.com

E-mail tsg@tsqusa.com

<http://www.tsqusa.com>





United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 85353-3	2. EPA Product Manager Marshall Swindell	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Copper Shield 82	PM# 33	
5. Name and Address of Applicant (Include ZIP Code) Global Brass and Copper Inc. 427 North Shamrock Street East Alton, IL 62024 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Label notification to add an Alternate Brand Name. See attached cover letter dated October 8, 2009 for details.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Amy Plato Roberts / aroberts@tsgusa.com		Title Regulatory Consultant	
		Telephone No. (Include Area Code) (202) 828-8963	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			8. Date Application Received (Stamped)
2. Signature 		3. Title Regulatory Consultant	
4. Typed Name Amy Plato Roberts		5. Date October 8, 2009	

[Front panel]

Copper Shield 82

Alternate Brand Name: "CuVerro^{III}_{TM}"

*NOTE: Product labels will bear the name of a copper alloy specified in the approved registration. Distributors may substitute a Product Brand Name in place of the name of the copper alloy on the label.

Active Ingredient:

Copper 82.6%[#]

Other 17.4%[#]

[#] Nominal percentages for purpose of review and approval. Actual percentage of copper and other ingredients will be indicated on labels distributed with the product.

Total 100%

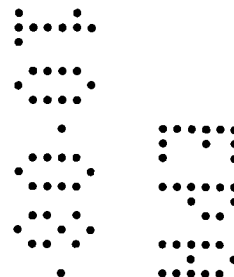
EPA Registration No. ****

EPA Establishment No. *****

Made in the United States by *****

Distributed by *****

Net Contents: *****



Global Brass and Copper Inc.: Copper Shield 82
Label NOTIFICATION to add an alternate brand name
Label version (2) dated October 8, 2009
Page 1 of 8

[Back panel]

Laboratory testing has shown that when cleaned regularly:

[This [product] [surface] continuously reduces bacterial* contamination, achieving 99.9% reduction within two hours of exposure.]

[This [product] surface kills greater than 99.9% of Gram-negative and Gram-positive bacteria* within two hours of exposure.]

[This [product] surface delivers continuous and ongoing antibacterial* action, remaining effective in killing greater than 99.9% of bacteria* within two hours, even after repeated wet and dry abrasion and re-contamination.]

[When cleaned regularly, this [product] surface kills greater than 99.9% of bacteria* within two hours, and continues to kill more than 99% of bacteria* even after repeated contamination.]

[This [product] surface helps inhibit the buildup and growth of bacteria* within two hours of exposure between routine cleaning and sanitizing steps.]

* Testing demonstrates effective antibacterial activity against *Staphylococcus aureus*, *Enterobacter aerogenes*, Methicillin-Resistant *Staphylococcus aureus* (MRSA), *Escherichia coli* O157:H7, and *Pseudomonas aeruginosa*.

The use of a copper surface is a supplement to and not a substitute for standard infection control practices; users must continue to follow all current infection control practices, including those practices related to cleaning and disinfection of environmental surfaces. The copper surface material has been shown to reduce microbial contamination, but it does not necessarily prevent cross contamination.

* * * * *

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

[The directions in bracketed text below may be included in an insert. If so, there will be a statement to see the insert for additional directions for use of the product.]

[Directions for Use in the insert also may include installation and operation instructions, user manuals, and similar instructional materials appropriate for the end use product. No additional pesticidal claims will be made as part of these materials.]

Proper Care and Use of Copper Shield 82: The use of [antimicrobial copper surfaces], [this surface] does not replace standard infection control procedures and good hygienic

Global Brass and Copper Inc.: Copper Shield 82
Label NOTIFICATION to add an alternate brand name
Label version (2) dated October 9, 2009
Page 2 of 8

practices. Surface[s] must be cleaned and sanitized according to standard practice. Health care facilities must maintain the product in accordance with infection control guidelines; users must continue to follow all current infection control practices, including those practices related to disinfection of environmental surfaces.

Surface[s] may be subject to recontamination and the level of active bacteria at any particular time will depend on the frequency and timing of recontamination and cleanliness of the surface (among other factors). In order for the surface to have proper antimicrobial effect, the product must be cleaned and maintained according to the directions included on this label.

This product must not be waxed, painted, lacquered, varnished, or otherwise coated.

Routine cleaning to remove dirt and filth is necessary for good sanitation and to assure the effective antibacterial performance of the [antimicrobial] copper surface. Cleaning agents typically used for traditional touch [hard] surfaces are permissible; the appropriate cleaning agent depends on the type of soiling and the measure of sanitization required. [Normal tarnishing or wear of [antimicrobial] copper surfaces will not impair the antibacterial effectiveness of the product.]

This product can not be used for any direct food contact or food packaging uses.

[This product may be used in hospitals, other healthcare facilities, and various public, commercial, and residential buildings for the non-food contact surfaces listed below.] [The following statement will appear on the label if the use involves potential exposure to outdoor conditions: Surfaces that may be exposed to outdoor environmental conditions (e.g., handrails, shopping carts, child seats and ATM machines) are not representative of indoor laboratory test conditions, and therefore, may impart reduced efficacy if not cleaned when visibly soiled.]

Healthcare Facilities

- Bedrails, footboards
- Over-bed tables
- Bed-side tables in hospitals, extended care facilities, senior housing etc. (knobs, pulls, handles; surfaces)
- Handrails, (corridor/hallways) (Senior housing), automatic door push plates
- Stair rails, handrails, tubular railing, and supports, rail fittings T's, elbows and brackets
- Bedrails, assistance rails,
- Toilet safety rails
- Carts

Hospital carts (table surfaces, handles, legs)

Computer carts

Record carts

Phlebotomy carts

Other Carts (tables/surfaces, shelving, railings, handles, pulls)

- Equipment carts (horizontal surfaces, frames, handles)
- Door push plates, kick plates, mop plates, stretcher plates
- Sinks: spigots, drains, sinks themselves



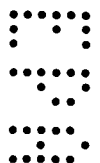
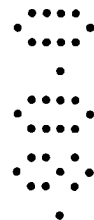
- Faucet: handles, spigot, drain control lever
- Water fountains: bubbler head, drain strainer, handle
- Alcohol sanitizer dispenser, handle
- Paper towel holders, facial tissue holders, toilet paper holders
- Air hand dryer, controls and push buttons on air hand dryers
- Hydrotherapy tanks (whirlpool tanks): shells, covers, headrests, drain fittings (outer surfaces without water contact)
- Door handles, doorknobs (outer touch surfaces)
- Grab bars in bathrooms showers and bathtubs
- Panic bars on emergency room doors
- Towel bars
- Showerheads
- Countertops and tabletops (non-food use only)
- Hinges, locks, latches, and trim
- Door stops, door pulls, and protector guards
- Toilet and urinal hardware, levers, push buttons
- Toilet seat inlay for lifting of seat
- Closures
- Vertical locking arms
- Vertical cover guards
- Protection bars
- Light switches, switch plates
- Visitor chairs: armrests, metal frames
- Thermostat covers, control knobs and wheels
- Telephone handsets and surfaces (housings), keypad
- Kitchen surfaces (non-food contact only): table tops, counter tops, handles (microwave, refrigerator, stove), cabinet doors, cabinet hinges, pulls, backsplash, hoods, control knobs (appliances, fans)
- Floor tiles
- Ceiling tiles (non-porous)
- Wall tiles
- Instrument handles

Medical equipment knobs, pulls and handles for:

- Drug delivery systems
- Monitoring systems
- Hospital beds
- Office equipment
- Operating room equipment
- Stands and fixtures

Types of knobs: *e.g.*, Prong, fluted, knurled, push/pull, T-handle, tapered, and ball knobs

- Intravenous (IV) poles, bases, hangers, clips
- Trays (instruments, non-food contact)
- Pans (bed)
- Walkers, wheelchair handles, and tubular components
- Computer keyboards: keys, housings, computer mouse surfaces
- Exercise and rehabilitation equipment, handles, bars



- Physical therapy equipment: physical therapy tables, treatment chairs and portable taping tables
- Chairs (shower chairs, patient chairs, visitor chairs): rails, backs, legs, seats
- Lighting products: X-ray illuminators, operating rooms, patient examination rooms, surgical suites, and reading lamps for hospital rooms and assisted living facilities etc. Components can include bases, arms, housings, handles, hinges)
- Headwall systems: the unit themselves, outlet covers, knobs and dials, lighting units (lamp housings and adjustable arms), CRT monitors with rotating knobs and levers and adjustments. Baskets, monitor housings, knobs, baskets, tables, IV poles
- Critical care cart: Table top, drawer, drawer pull, lock, copper wire baskets for storage of equipment and charts.
- Bedside lavatory: sink, faucet, handles, drawer pulls, toilet seat, toilet seat cover, toilet handle, door and cabinet facings, counter tops
- Medical records: Chart holders, clipboards, filing systems
- Storage Shelving: wire shelving etc. for medical supplies
- Grab handles on privacy curtains
- Lids of laundry hampers, trash canisters, and other containers

Community Facilities (including various public and commercial buildings)

- Shopping cart handles, child seats, handrails
- Cash registers: housing, keypads
- ATM machines: keys, housing
- Gym/Health club lockers, locker handles, locker shelving, trainers' tables,
- Ice and water dispensers (outer surfaces without water contact)
- Elevator: handrail, control panel, buttons, interior walls, floor tiles, exterior call button plate
- Paper towel dispensers. Housing itself, (turn) handle, (push) handle
- Soap holder
- Soap dispenser (wall mounted): push bar and dispenser itself
- Soap dispenser (sitting on counter): dispenser housing itself, push mechanism
- Toilet paper dispenser (housing)
- Windows (crank), Locking mechanism, pull handles
- Window treatments (cord pulls), Venetian blinds (wands, cord pulls)
- Jalousie Windows (crank)
- Casement (cranks, levers, hinges)
- Single and double-hung windows (locks and pulls)
- Light switches, switch plates
- Lids of laundry hampers, trash canisters, and other containers

Residential Buildings (including homes, apartments, apartment buildings and other residences)

- Kitchen surfaces (non-food contact only): table tops, counter tops, handles (microwave, refrigerator, stove), cabinet doors, cabinet hinges, pulls, backsplash, hoods, control knobs (appliances, fans)
- Bedrails, footboards
- Handrails

- Stair rails
- Door push plates
- Sinks: spigots, drains, sinks themselves
- Faucet: handles, spigot, drain control lever
- Paper towel holders, facial tissue holders, toilet paper holders
- Door handles, doorknobs (outer touch surfaces)
- Grab bars in bathrooms showers and bathtubs
- Towel bars
- Showerheads
- Countertops and tabletops
- Hinges, locks, latches, and trim
- Door stops, door pulls, and protector guards
- Toilet and urinal hardware, levers, push buttons
- Toilet seat inlay for lifting of seat
- Light switches, switch plates
- Thermostat covers, control knobs and wheels
- Telephone handsets and surfaces (housings), keypad
- Floor tiles
- Ceiling tiles (non-porous)
- Wall tiles
- Computer keyboards: keys, housings, computer mouse surfaces
- Exercise equipment, handles, bars
- Windows (crank), Locking mechanism, pull handles
- Window treatments (cord pulls), Venetian blinds (wands, cord pulls)
- Jalousie Windows (crank)
- Casement (cranks, levers, hinges)
- Single and double-hung windows (locks and pulls)
- Television control knobs and buttons
- Lids of laundry hampers, trash canisters, and other containers

Other

- Play area equipment (indoor only): bars, handles, chains, push plates, handrails, stair rails and risers, wheels, knobs, flooring

STORAGE AND DISPOSAL

Copper Shield 82 should be disposed in a responsible manner, including recycling.

WARRANTY STATEMENT

If used as intended, Copper Shield 82 is wear-resistant and the durable antibacterial properties will remain effective for as long as the product remains in place and is used as directed.

Global Brass and Copper Inc.: Copper Shield 82
Label NOTIFICATION to add an alternate brand name
Label version (2) dated October 8, 2009
Page 6 of 8

Optional Label Claims:

[Residential]

- Kills 99.9% of *Staphylococcus aureus*, *Escherichia coli* O157:H7, and *Pseudomonas aeruginosa*.
- This product kills *bacteria continuously.
- Kills bacteria continuously
- This product inhibits the growth of *Staphylococcus aureus*, *Escherichia coli* O157:H7, and *Pseudomonas aeruginosa* on its surface.
- Continuously kills bacteria on its surface
- Continuously reduces bacterial contamination
- Kills/eliminates/reduces germs/bacteria left behind (by dirty hands)
- Works even when you're sleeping.
- Provides On-Going Protection
- Continues to reduce/kill bacteria even when you don't have time to clean/disinfect

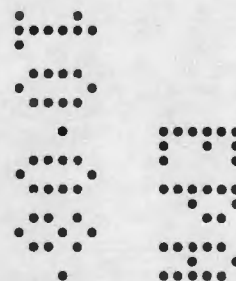
* Testing demonstrates effective antibacterial activity against *Staphylococcus aureus*, *Escherichia coli* O157:H7, and *Pseudomonas aeruginosa*.

[Industrial and Commercial]

- Kills 99.9% of *Staphylococcus aureus*, *Enterobacter aerogenes*, Methicillin-Resistant *Staphylococcus aureus* (MRSA), *Escherichia coli* O157:H7, and *Pseudomonas aeruginosa*.
- Kills *bacteria continuously.
- Inhibits the growth of *Staphylococcus aureus*, *Enterobacter aerogenes*, Methicillin-Resistant *Staphylococcus aureus* (MRSA), *Escherichia coli* O157:H7, and *Pseudomonas aeruginosa* on its surface.
- Continuously Reduces bacterial growth on this common touch surface
- Continuously kills bacteria left behind on this surface by users/the public/your customers.

Global Brass and Copper Inc.: Copper Shield 82
Label NOTIFICATION to add an alternate brand name
Label version (2) dated October 8, 2009
Page 7 of 8

* Testing demonstrates effective antibacterial activity against *Staphylococcus aureus*, *Enterobacter aerogenes*, Methicillin-Resistant *Staphylococcus aureus* (MRSA), *Escherichia coli* O157:H7, and *Pseudomonas aeruginosa*.





U.S. ENVIRONMENTAL PROTECTION
AGENCY

Office of Pesticide Programs
Antimicrobials Division (7510C)
1200 Pennsylvania Avenue NW
Washington, D.C. 20460

NOTICE OF PESTICIDE:

☒ Registration
☐ Reregistration

(under FIFRA, as amended)

EPA Reg.

Number:

85353-3

Date of

Issuance: 3

Term of Issuance:

Unconditional

Name of Pesticide Product:

Copper Shield 82

Name and Address of Registrant (include ZIP Code):

Global Brass and Copper Inc.
427 North Shamrock Street
East Alton, IL 62024

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

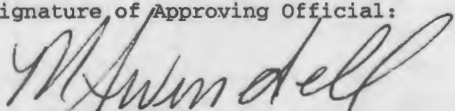
On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA Section 3(c)(7)(A) provided that you:

1. Submit and/or cite all the data required for registration of your product under FIFRA Section 3(c)(5) when the Agency requires all registrants of similar products to submit such data; and submit required by registration review under FIFRA Section 3(g).
2. Make the following labeling changes:
 - a. Revise the EPA Registration Number to read, EPA Reg. No. 85353-3.
 - b. Place the appropriate EPA Establishment Number on the product labeling.

Signature of Approving Official:


Marshall Swindell, Product Manager, Team 33
Regulatory Management Branch I, Antimicrobials Division

Date:

DEC 23 2000

The Confidential Statement of Formula dated October 22nd, 2008, is acceptable.

The following are a listing of Conditions of Registration for Antimicrobial Copper Alloy registrations and associated labeling issues:

Condition 1

CDA will prepare and implement an Antimicrobial Copper Alloy Stewardship Plan ("the Plan") designed to support the responsible use of antimicrobial copper products. The Plan will be submitted for EPA review and approval within two months after the registration date. If EPA determines at any time after 18 months following registration that the Plan is not being adequately or timely implemented or that implementation of the Plan is not effectively ensuring the proper sale, distribution, or use of antimicrobial copper alloy products, the registration may be automatically cancelled by the Agency by order with no opportunity for a hearing but only after notification to the Registrant and an opportunity to meet with the Director of the Office of Pesticide Programs.

The Plan will include, at a minimum, the following elements:

- (a) Outreach to the infection control community, including:
 - (i) A goal of educating and reinforcing, for infection control professionals and other product users, the proper use of Antimicrobial Copper Alloys.
 - (ii) Written (including electronic) communications directed to associations of infection control professionals, including at the least APIC, ASHES, and any other relevant organizations identified by CDA or EPA, and State Departments of Health.
 - (iii) Outreach communications will be sent within six months after the date of registration and within one year after the date of registration, and then annually thereafter on the anniversary of the date of the registration unless more frequent outreach is deemed necessary.
 - (iv) The content of the outreach communications will include statements explaining the registered claims and applications of Antimicrobial Copper Alloys, as well as their proper use. The communications also will inform the recipients about (1) the Antimicrobial Copper Alloy Working Group (see below) and invite their participation; (2) other sources of information on Antimicrobial Copper Alloys, including the Stewardship Website (see below). Additional content of outreach efforts will be developed as part of the Working Group activities.

- (b) Development of a Stewardship Website ("the Website") under the auspices of the Copper Development Association ("CDA").
 - (i) The Website will serve as a resource for conveying accurate information to the public about the efficacy and proper use of Antimicrobial Copper Alloys.
 - (ii) The Website will include information on proper labeling and claims (including advertising); supporting science; applications; maintenance; and federal and state regulations and statutory requirements.
 - (iii) A question and answer or Frequently Asked Questions (FAQs) section will be incorporated to address common issues or questions raised with regard to Antimicrobial Copper Alloys.
 - (iv) The Website also will serve as a forum to correct any false or misleading third party statements or publications, including scientific papers, concerning Antimicrobial Copper Alloys. Any such false or misleading third party statements or publications will be corrected promptly after CDA or any member of CDA becomes aware of such and the responsive Website update will be incorporated promptly thereafter. CDA shall inform EPA within 30 calendar days following its receipt of any such false or misleading third party statements or publications and at that same time provide the Agency with a copy of such statement or publication along with a hard copy of the Website entry correcting such statement or publication.
 - (v) Links will be arranged and established by CDA between the Stewardship Website and the websites of appropriate infection control organizations, including but not limited to APIC and ASHES.
- (c) Establishment of an Antimicrobial Copper Alloy Working Group ("the Working Group").
 - (i) Invited participants will include alloy manufacturers, component makers, and representatives from the infection control community, including appropriate trade associations (*e.g.*, APIC and ASHES) and State Departments of Health.
 - (ii) The Working Group will meet at least twice a year, either in person or by live video conferencing (WEBEX) or teleconferencing.
 - (iii) The Working Group will serve as a forum to expand educational efforts, develop outreach communications, and address any questions or concerns from the public and infection control community.
 - (iv) CDA shall provide EPA with minutes of any such meetings within 60 days of the end of any such meeting.

Condition 2

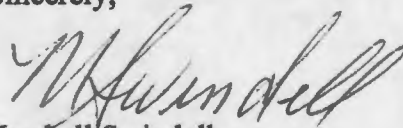
For at least the first 24 months after registration or until the Agency terminates this condition, whichever is later, the CDA will submit to EPA sample advertising materials. Advertising materials will be representative of advertisements intended for use in the marketplace.

3. Submit three (3) copies of the final printed label prior to releasing this product for sale.

A stamped copy of the label is enclosed for your records.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e) or as may be deemed appropriate by the Agency, as provided for in Condition 1. Your release for shipment of the product constitutes acceptance of these conditions.

Sincerely,



Marshall Swindell
Product Manager 33
Regulatory Branch I
Antimicrobials Division (7510P)

Enclosure: (Stamped Labeling)

[Front panel]

Copper Shield 82

*NOTE: Product labels will bear the name of a copper alloy specified in the approved registration. Distributors may substitute a Product Brand Name in place of the name of the copper alloy on the label.

Active Ingredient:

Copper	82.6% [#]
Other	17.4% [#]

[#] Nominal percentages for purpose of review and approval. Actual percentage of copper and other ingredients will be indicated on labels distributed with the product.

Total	100%
-------	------

EPA Registration No. ****

Made in the United States by *****

EPA Establishment No. *****

Distributed by *****

Net Contents: *****

ACCEPTED
with COMMENTS
EPA Letter Dated:

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. **85353-3**

[Back panel]

Laboratory testing has shown that when cleaned regularly:

[This [product] [surface] continuously reduces bacterial* contamination, achieving 99.9% reduction within two hours of exposure.]

[This [product] surface kills greater than 99.9% of Gram-negative and Gram-positive bacteria* within two hours of exposure.]

[This [product] surface delivers continuous and ongoing antibacterial* action, remaining effective in killing greater than 99.9% of bacteria* within two hours, even after repeated wet and dry abrasion and re-contamination.]

[When cleaned regularly, this [product] surface kills greater than 99.9% of bacteria* within two hours, and continues to kill more than 99% of bacteria* even after repeated contamination.]

[This [product] surface helps inhibit the buildup and growth of bacteria* within two hours of exposure between routine cleaning and sanitizing steps.]

* Testing demonstrates effective antibacterial activity against *Staphylococcus aureus*, *Enterobacter aerogenes*, Methicillin-Resistant *Staphylococcus aureus* (MRSA), *Escherichia coli* O157:H7, and *Pseudomonas aeruginosa*.

The use of a copper surface is a supplement to and not a substitute for standard infection control practices; users must continue to follow all current infection control practices, including those practices related to cleaning and disinfection of environmental surfaces. The copper surface material has been shown to reduce microbial contamination, but it does not necessarily prevent cross contamination.

* * * * *

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

[The directions in bracketed text below may be included in an insert. If so, there will be a statement to see the insert for additional directions for use of the product.]

[Directions for Use in the insert also may include installation and operation instructions, user manuals, and similar instructional materials appropriate for the end use product. No additional pesticidal claims will be made as part of these materials.]

Proper Care and Use of Copper Shield 82: The use of [antimicrobial copper surfaces] [this surface] does not replace standard infection control procedures and good hygienic practices. Surface[s] must be cleaned and sanitized according to standard practice. Health care facilities must maintain the product in accordance with infection control guidelines; users

must continue to follow all current infection control practices, including those practices related to disinfection of environmental surfaces.

Surface[s] may be subject to recontamination and the level of active bacteria at any particular time will depend on the frequency and timing of recontamination and cleanliness of the surface (among other factors). In order for the surface to have proper antimicrobial effect, the product must be cleaned and maintained according to the directions included on this label.

This product must not be waxed, painted, lacquered, varnished, or otherwise coated.

Routine cleaning to remove dirt and filth is necessary for good sanitation and to assure the effective antibacterial performance of the [antimicrobial] copper surface. Cleaning agents typically used for traditional touch [hard] surfaces are permissible; the appropriate cleaning agent depends on the type of soiling and the measure of sanitization required. [Normal tarnishing or wear of [antimicrobial] copper surfaces will not impair the antibacterial effectiveness of the product.]

This product can not be used for any direct food contact or food packaging uses.

[This product may be used in hospitals, other healthcare facilities, and various public, commercial, and residential buildings for the non-food contact surfaces listed below.] [The following statement will appear on the label if the use involves potential exposure to outdoor conditions: Surfaces that may be exposed to outdoor environmental conditions (e.g., handrails, shopping carts, child seats and ATM machines) are not representative of indoor laboratory test conditions, and therefore, may impart reduced efficacy if not cleaned when visibly soiled.]

Healthcare Facilities

- Bedrails, footboards
- Over-bed tables
- Bed-side tables in hospitals, extended care facilities, senior housing etc. (knobs, pulls, handles; surfaces)
- Handrails, (corridor/hallways) (Senior housing), automatic door-closers
- Stair rails, handrails, tubular railing, and supports, rail fittings, brackets
- Bedrails, assistance rails,
- Toilet safety rails
- Carts

Hospital carts (table surfaces, handles, legs)

Computer carts

Record carts

Phlebotomy carts

Other Carts (tables/surfaces, shelving, railings, handles, pulls)

- Equipment carts (horizontal surfaces, frames, handles)
- Door push plates, kick plates, mop plates, stretcher plates
- Sinks: spigots, drains, sinks themselves
- Faucet: handles, spigot, drain control lever
- Water fountains: bubbler head, drain strainer, handle

ACCEPTED
With COMMENTS
EPA Letter Dated:

DEC 27 2008
Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide
registered under EPA Reg. No. 85353-3

- Alcohol sanitizer dispenser, handle
- Paper towel holders, facial tissue holders, toilet paper holders
- Air hand dryer, controls and push buttons on air hand dryers
- Hydrotherapy tanks (whirlpool tanks): shells, covers, headrests, drain fittings (outer surfaces without water contact)
- Door handles, doorknobs (outer touch surfaces)
- Grab bars in bathrooms showers and bathtubs
- Panic bars on emergency room doors
- Towel bars
- Showerheads
- Countertops and tabletops (non-food use only)
- Hinges, locks, latches, and trim
- Door stops, door pulls, and protector guards
- Toilet and urinal hardware, levers, push buttons
- Toilet seat inlay for lifting of seat
- Closures
- Vertical locking arms
- Vertical cover guards
- Protection bars
- Light switches, switch plates
- Visitor chairs: armrests, metal frames
- Thermostat covers, control knobs and wheels
- Telephone handsets and surfaces (housings), keypad
- Kitchen surfaces (non-food contact only): table tops, counter tops, handles (microwave, refrigerator, stove), cabinet doors, cabinet hinges, pulls, backsplash, hoods, control knobs (appliances, fans)
- Floor tiles
- Ceiling tiles (non-porous)
- Wall tiles
- Instrument handles

Medical equipment knobs, pulls and handles for:

- Drug delivery systems
- Monitoring systems
- Hospital beds
- Office equipment
- Operating room equipment
- Stands and fixtures

Types of knobs: *e.g.*, Prong, fluted, knurled, push/pull, T-handle, tapered, and ball knobs

- Intravenous (IV) poles, bases, hangers, clips
- Trays (instruments, non-food contact)
- Pans (bed)
- Walkers, wheelchair handles, and tubular components
- Computer keyboards: keys, housings, computer mouse surfaces
- Exercise and rehabilitation equipment, handles, bars
- Physical therapy equipment: physical therapy tables, treatment chairs and portable taping tables

ACCEPTED
with COMMENTS
EPA Letter Dated:

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide
registered under EPA Reg. No. 85353-3

- Chairs (shower chairs, patient chairs, visitor chairs): rails, backs, legs, seats
- Lighting products: X-ray illuminators, operating rooms, patient examination rooms, surgical suites, and reading lamps for hospital rooms and assisted living facilities etc. Components can include bases, arms, housings, handles, hinges)
- Headwall systems: the unit themselves, outlet covers, knobs and dials, lighting units (lamp housings and adjustable arms), CRT monitors with rotating knobs and levers and adjustments. Baskets, monitor housings, knobs, baskets, tables, IV poles
- Critical care cart: Table top, drawer, drawer pull, lock, copper wire baskets for storage of equipment and charts.
- Bedside lavatory: sink, faucet, handles, drawer pulls, toilet seat, toilet seat cover, toilet handle, door and cabinet facings, counter tops
- Medical records: Chart holders, clipboards, filing systems
- Storage Shelving: wire shelving etc. for medical supplies
- Grab handles on privacy curtains
- Lids of laundry hampers, trash canisters, and other containers

ACCEPTED
with COMMENTS
EPA Letter Dated:

DEC 23

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 853533

Community Facilities (including various public and commercial buildings)

- Shopping cart handles, child seats, handrails
- Cash registers: housing, keypads
- ATM machines: keys, housing
- Gym/Health club lockers, locker handles, locker shelving, trainers' tables,
- Ice and water dispensers (outer surfaces without water contact)
- Elevator: handrail, control panel, buttons, interior walls, floor tiles, exterior call button plate
- Paper towel dispensers. Housing itself, (turn) handle, (push) handle
- Soap holder
- Soap dispenser (wall mounted): push bar and dispenser itself
- Soap dispenser (sitting on counter): dispenser housing itself, push mechanism
- Toilet paper dispenser (housing)
- Windows (crank), Locking mechanism, pull handles
- Window treatments (cord pulls), Venetian blinds (wands, cord pulls)
- Jalousie Windows (crank)
- Casement (cranks, levers, hinges)
- Single and double-hung windows (locks and pulls)
- Light switches, switch plates
- Lids of laundry hampers, trash canisters, and other containers

Residential Buildings (including homes, apartments, apartment buildings and other residences)

- Kitchen surfaces (non-food contact only): table tops, counter tops, handles (microwave, refrigerator, stove), cabinet doors, cabinet hinges, pulls, backsplash, hoods, control knobs (appliances, fans)
- Bedrails, footboards
- Handrails
- Stair rails
- Door push plates

- Sinks: spigots, drains, sinks themselves
- Faucet: handles, spigot, drain control lever
- Paper towel holders, facial tissue holders, toilet paper holders
- Door handles, doorknobs (outer touch surfaces)
- Grab bars in bathrooms showers and bathtubs
- Towel bars
- Showerheads
- Countertops and tabletops
- Hinges, locks, latches, and trim
- Door stops, door pulls, and protector guards
- Toilet and urinal hardware, levers, push buttons
- Toilet seat inlay for lifting of seat
- Light switches, switch plates
- Thermostat covers, control knobs and wheels
- Telephone handsets and surfaces (housings), keypad
- Floor tiles
- Ceiling tiles (non-porous)
- Wall tiles
- Computer keyboards: keys, housings, computer mouse surfaces
- Exercise equipment, handles, bars
- Windows (crank), Locking mechanism, pull handles
- Window treatments (cord pulls), Venetian blinds (wands, cord pulls)
- Jalousie Windows (crank)
- Casement (cranks, levers, hinges)
- Single and double-hung windows (locks and pulls)
- Television control knobs and buttons
- Lids of laundry hampers, trash canisters, and other containers

ACCEPTED
with COMMENTS
EPA Letter Dated:

DEC 23 2008
Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide
registered under EPA Reg. No. 85353-3

Other

- Play area equipment (indoor only): bars, handles, chains, push plates, handrails, stair rails and risers, wheels, knobs, flooring

STORAGE AND DISPOSAL

Copper Shield 82 should be disposed in a responsible manner, including recycling.

WARRANTY STATEMENT

If used as intended, Copper Shield 82 is wear-resistant and the durable antibacterial properties will remain effective for as long as the product remains in place and is used as directed.

Optional Label Claims:

[Residential]

- Kills 99.9% of *Staphylococcus aureus*, *Escherichia coli* O157:H7, and *Pseudomonas aeruginosa*.
 - This product kills *bacteria continuously.
 - Kills bacteria continuously
 - This product inhibits the growth of *Staphylococcus aureus*, *Escherichia coli* O157:H7, and *Pseudomonas aeruginosa* on its surface.
 - Continuously kills bacteria on its surface
 - Continuously reduces bacterial contamination
 - Kills/eliminates/reduces germs/bacteria left behind (by dirty hands).
 - Works even when you're sleeping.
 - Provides On-Going Protection
 - Continues to reduce/kill bacteria even when you don't have time to clean/disinfect
- * Testing demonstrates effective antibacterial activity against *Staphylococcus aureus*, *Escherichia coli* O157:H7, and *Pseudomonas aeruginosa*.

ACCEPTED
with COMMENTS
EPA Letter Dated:

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide
registered under EPA Reg. No. 85353-3

[Industrial and Commercial]

- Kills 99.9% of *Staphylococcus aureus*, *Enterobacter aerogenes*, Methicillin-Resistant *Staphylococcus aureus* (MRSA), *Escherichia coli* O157:H7, and *Pseudomonas aeruginosa*.
- Kills *bacteria continuously.
- Inhibits the growth of *Staphylococcus aureus*, *Enterobacter aerogenes*, Methicillin-Resistant *Staphylococcus aureus* (MRSA), *Escherichia coli* O157:H7, and *Pseudomonas aeruginosa* on its surface.
- Continuously Reduces bacterial growth on this common touch surface
- Continuously kills bacteria left behind on this surface by users/the public/your customers.

* Testing demonstrates effective antibacterial activity against *Staphylococcus aureus*, *Enterobacter aerogenes*, Methicillin-Resistant *Staphylococcus aureus* (MRSA), *Escherichia coli* O157:H7, and *Pseudomonas aeruginosa*.

ACCEPTED
with COMMENTS
EPA Letter Dated:

Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 86353-3



U.S. ENVIRONMENTAL PROTECTION
AGENCY

Office of Pesticide Programs
Antimicrobials Division (7510C)
1200 Pennsylvania Avenue NW
Washington, D.C. 20460

NOTICE OF PESTICIDE:

 X Registration
 Reregistration

(under FIFRA, as amended)

EPA Reg.

Number:

85353-3

Date of

Issuance:

Term of Issuance:

Unconditional

Name of Pesticide Product:

Copper Shield 82

Name and Address of Registrant (include ZIP Code):

Global Brass and Copper Inc.
427 North Shamrock Street
East Alton, IL 62024

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA Section 3(c)(7)(A) provided that you:

1. Submit and/or cite all the data required for registration of your product under FIFRA Section 3(c)(5) when the Agency requires all registrants of similar products to submit such data; and submit required by registration review under FIFRA Section 3(g).
2. Make the following labeling changes:
 - a. Revise the EPA Registration Number to read, EPA Reg. No. 85353-3.
 - b. Place the appropriate EPA Establishment Number on the product labeling.

Signature of Approving Official:

Marshall Swindell, Product Manager, Team 33
Regulatory Management Branch I, Antimicrobials Division

Date:

Page 2

EPA Reg. No. 85353-3

3. Submit three copies of the final printed label prior to releasing this product for sale.

The Confidential Statement of Formula dated October 22nd, 2008, is acceptable.

A stamped copy of the label is enclosed for your records.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec.6(e). Your release for shipment of the product constitutes acceptance of these conditions.

Sincerely,

Marshall Swindell
Product Manager 33
Regulatory Management Branch I
Antimicrobial Division(7509P)

[Front panel]

Copper Shield 82

*NOTE: Product labels will bear the name of a copper alloy specified in the approved registration. Distributors may substitute a Product Brand Name in place of the name of the copper alloy on the label.

Active Ingredient:

Copper	82.6% [#]
Other	17.4% [#]

[#] Nominal percentages for purpose of review and approval. Actual percentage of copper and other ingredients will be indicated on labels distributed with the product.

Total	100%
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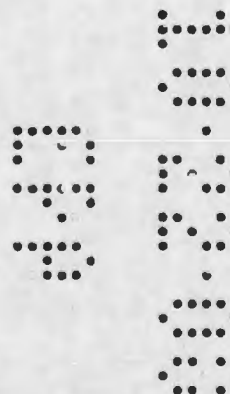
EPA Registration No. ****

EPA Establishment No. *****

Made in the United States by *****

Distributed by *****

Net Contents: *****



[Back panel]

Laboratory testing has shown that when cleaned regularly:

[This [product] [surface] continuously reduces bacterial* contamination, achieving 99.9% reduction within two hours of exposure.]

[This [product] surface kills greater than 99.9% of Gram-negative and Gram-positive bacteria* within two hours of exposure.]

[This [product] surface delivers continuous and ongoing antibacterial* action, remaining effective in killing greater than 99.9% of bacteria* within two hours, even after repeated wet and dry abrasion and re-contamination.]

[When cleaned regularly, this [product] surface kills greater than 99.9% of bacteria* within two hours, and continues to kill more than 99% of bacteria* even after repeated contamination.]

[This [product] surface helps inhibit the buildup and growth of bacteria* within two hours of exposure between routine cleaning and sanitizing steps.]

* Testing demonstrates effective antibacterial activity against *Staphylococcus aureus*, *Enterobacter aerogenes*, Methicillin-Resistant *Staphylococcus aureus* (MRSA), *Escherichia coli* O157:H7, and *Pseudomonas aeruginosa*.

The use of a copper surface is a supplement to and not a substitute for standard infection control practices; users must continue to follow all current infection control practices, including those practices related to cleaning and disinfection of environmental surfaces. The copper surface material has been shown to reduce microbial contamination, but it does not necessarily prevent cross contamination.

* * * * *

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

[The directions in bracketed text below may be included in an insert. If so, there will be a statement to see the insert for additional directions for use of the product.]

[Directions for Use in the insert also may include installation and operation instructions, user manuals, and similar instructional materials appropriate for the end use product. No additional pesticidal claims will be made as part of these materials.]

Proper Care and Use of Copper Shield 82: The use of [antimicrobial copper surfaces] [this surface] does not replace standard infection control procedures and good hygienic practices. Surface[s] must be cleaned and sanitized according to standard practice. Health care facilities must maintain the product in accordance with infection control guidelines; users

must continue to follow all current infection control practices, including those practices related to disinfection of environmental surfaces.

Surface[s] may be subject to recontamination and the level of active bacteria at any particular time will depend on the frequency and timing of recontamination and cleanliness of the surface (among other factors). In order for the surface to have proper antimicrobial effect, the product must be cleaned and maintained according to the directions included on this label.

This product must not be waxed, painted, lacquered, varnished, or otherwise coated.

Routine cleaning to remove dirt and filth is necessary for good sanitation and to assure the effective antibacterial performance of the [antimicrobial] copper surface. Cleaning agents typically used for traditional touch [hard] surfaces are permissible; the appropriate cleaning agent depends on the type of soiling and the measure of sanitization required. [Normal tarnishing or wear of [antimicrobial] copper surfaces will not impair the antibacterial effectiveness of the product.]

This product can not be used for any direct food contact or food packaging uses.

[This product may be used in hospitals, other healthcare facilities, and various public, commercial, and residential buildings for the non-food contact surfaces listed below.] [The following statement will appear on the label if the use involves potential exposure to outdoor conditions: Surfaces that may be exposed to outdoor environmental conditions (*e.g.*, handrails, shopping carts, child seats and ATM machines) are not representative of indoor laboratory test conditions, and therefore, may impart reduced efficacy if not cleaned when visibly soiled.]

Healthcare Facilities

- Bedrails, footboards
- Over-bed tables
- Bed-side tables in hospitals, extended care facilities, senior housing etc. (knobs, pulls, handles; surfaces)
- Handrails, (corridor/hallways) (Senior housing), automatic door push plates
- Stair rails, handrails, tubular railing, and supports, rail fittings T's, elbows and brackets
- Bedrails, assistance rails;
- Toilet safety rails
- Carts
 - Hospital carts (table surfaces, handles, legs)
 - Computer carts
 - Record carts
 - Phlebotomy carts
 - Other Carts (tables/surfaces, shelving, railings, handles, pulls)
- Equipment carts (horizontal surfaces, frames, handles)
- Door push plates, kick plates, mop plates, stretcher plates
- Sinks: spigots, drains, sinks themselves
- Faucet: handles, spigot, drain control lever
- Water fountains: bubbler head, drain strainer, handle

- Alcohol sanitizer dispenser, handle
- Paper towel holders, facial tissue holders, toilet paper holders
- Air hand dryer, controls and push buttons on air hand dryers
- Hydrotherapy tanks (whirlpool tanks): shells, covers, headrests, drain fittings (outer surfaces without water contact)
- Door handles, doorknobs (outer touch surfaces)
- Grab bars in bathrooms showers and bathtubs
- Panic bars on emergency room doors
- Towel bars
- Showerheads
- Countertops and tabletops (non-food use only)
- Hinges, locks, latches, and trim
- Door stops, door pulls, and protector guards
- Toilet and urinal hardware, levers, push buttons
- Toilet seat inlay for lifting of seat
- Closures
- Vertical locking arms
- Vertical cover guards
- Protection bars
- Light switches, switch plates
- Visitor chairs: armrests, metal frames
- Thermostat covers, control knobs and wheels
- Telephone handsets and surfaces (housings), keypad
- Kitchen surfaces (non-food contact only): table tops, counter tops, handles (microwave, refrigerator, stove), cabinet doors, cabinet hinges, pulls, backsplash, hoods, control knobs (appliances, fans)
- Floor tiles
- Ceiling tiles (non-porous)
- Wall tiles
- Instrument handles
 - Medical equipment knobs, pulls and handles for:
 - Drug delivery systems
 - Monitoring systems
 - Hospital beds
 - Office equipment
 - Operating room equipment
 - Stands and fixtures
 - Types of knobs: *e.g.*, Prong, fluted, knurled, push/pull, T-handle, tapered, and ball knobs
- Intravenous (IV) poles, bases, hangers, clips
- Trays (instruments, non-food contact)
- Pans (bed)
- Walkers, wheelchair handles, and tubular components
- Computer keyboards: keys, housings, computer mouse surfaces
- Exercise and rehabilitation equipment, handles, bars
- Physical therapy equipment: physical therapy tables, treatment chairs and portable taping tables

- Chairs (shower chairs, patient chairs, visitor chairs): rails, backs, legs, seats
- Lighting products: X-ray illuminators, operating rooms, patient examination rooms, surgical suites, and reading lamps for hospital rooms and assisted living facilities etc. Components can include bases, arms, housings, handles, hinges)
- Headwall systems: the unit themselves, outlet covers, knobs and dials, lighting units (lamp housings and adjustable arms), CRT monitors with rotating knobs and levers and adjustments. Baskets, monitor housings, knobs, baskets, tables, IV poles
- Critical care cart: Table top, drawer, drawer pull, lock, copper wire baskets for storage of equipment and charts.
- Bedside lavatory: sink, faucet, handles, drawer pulls, toilet seat, toilet seat cover, toilet handle, door and cabinet facings, counter tops
- Medical records: Chart holders, clipboards, filing systems
- Storage Shelving: wire shelving etc. for medical supplies
- Grab handles on privacy curtains
- Lids of laundry hampers, trash canisters, and other containers

Community Facilities (including various public and commercial buildings)

- Shopping cart handles, child seats, handrails
- Cash registers: housing, keypads
- ATM machines: keys, housing
- Gym/Health club lockers, locker handles, locker shelving, trainers' tables,
- Ice and water dispensers (outer surfaces without water contact)
- Elevator: handrail, control panel, buttons, interior walls, floor tiles, exterior call button plate
- Paper towel dispensers. Housing itself, (turn) handle, (push) handle
- Soap holder
- Soap dispenser (wall mounted): push bar and dispenser itself
- Soap dispenser (sitting on counter): dispenser housing itself, push mechanism
- Toilet paper dispenser (housing)
- Windows (crank), Locking mechanism, pull handles
- Window treatments (cord pulls), Venetian blinds (wands, cord pulls)
- Jalousie Windows (crank)
- Casement (cranks, levers, hinges)
- Single and double-hung windows (locks and pulls)
- Light switches, switch plates
- Lids of laundry hampers, trash canisters, and other containers

Residential Buildings (including homes, apartments, apartment buildings and other residences)

- Kitchen surfaces (non-food contact only): table tops, counter tops, handles (microwave, refrigerator, stove), cabinet doors, cabinet hinges, pulls, backsplash, hoods, control knobs (appliances, fans)
- Bedrails, footboards
- Handrails
- Stair rails
- Door push plates

- Sinks: spigots, drains, sinks themselves
- Faucet: handles, spigot, drain control lever
- Paper towel holders, facial tissue holders, toilet paper holders
- Door handles, doorknobs (outer touch surfaces)
- Grab bars in bathrooms showers and bathtubs
- Towel bars
- Showerheads
- Countertops and tabletops
- Hinges, locks, latches, and trim
- Door stops, door pulls, and protector guards
- Toilet and urinal hardware, levers, push buttons
- Toilet seat inlay for lifting of seat
- Light switches, switch plates
- Thermostat covers, control knobs and wheels
- Telephone handsets and surfaces (housings), keypad
- Floor tiles
- Ceiling tiles (non-porous)
- Wall tiles
- Computer keyboards: keys, housings, computer mouse surfaces
- Exercise equipment, handles, bars
- Windows (crank), Locking mechanism, pull handles
- Window treatments (cord pulls), Venetian blinds (wands, cord pulls)
- Jalousie Windows (crank)
- Casement (cranks, levers, hinges)
- Single and double-hung windows (locks and pulls)
- Television control knobs and buttons
- Lids of laundry hampers, trash canisters, and other containers

Other

- Play area equipment (indoor only): bars, handles, chains, push plates, handrails, stair rails and risers, wheels, knobs, flooring

STORAGE AND DISPOSAL

Copper Shield 82 should be disposed in a responsible manner, including recycling.

WARRANTY STATEMENT

If used as intended, Copper Shield 82 is wear-resistant and the durable antibacterial properties will remain effective for as long as the product remains in place and is used as directed.

Optional Label Claims:

[Residential]

- Kills 99.9% of *Staphylococcus aureus*, *Escherichia coli* O157:H7, and *Pseudomonas aeruginosa*.
 - This product kills *bacteria continuously.
 - Kills bacteria continuously
 - This product inhibits the growth of *Staphylococcus aureus*, *Escherichia coli* O157:H7, and *Pseudomonas aeruginosa* on its surface.
 - Continuously kills bacteria on its surface
 - Continuously reduces bacterial contamination
 - Kills/eliminates/reduces germs/bacteria left behind (by dirty hands)
 - Works even when you're sleeping.
 - Provides On-Going Protection
 - Continues to reduce/kill bacteria even when you don't have time to clean/disinfect
- * Testing demonstrates effective antibacterial activity against *Staphylococcus aureus*, *Escherichia coli* O157:H7, and *Pseudomonas aeruginosa*.

[Industrial and Commercial]

- Kills 99.9% of *Staphylococcus aureus*, *Enterobacter aerogenes*, Methicillin-Resistant *Staphylococcus aureus* (MRSA), *Escherichia coli* O157:H7, and *Pseudomonas aeruginosa*.
- Kills *bacteria continuously.
- Inhibits the growth of *Staphylococcus aureus*, *Enterobacter aerogenes*, Methicillin-Resistant *Staphylococcus aureus* (MRSA), *Escherichia coli* O157:H7, and *Pseudomonas aeruginosa* on its surface.
- Continuously Reduces bacterial growth on this common touch surface
- Continuously kills bacteria left behind on this surface by users/the public/your customers.

* Testing demonstrates effective antibacterial activity against *Staphylococcus aureus*, *Enterobacter aerogenes*, Methicillin-Resistant *Staphylococcus aureus* (MRSA), *Escherichia coli* O157:H7, and *Pseudomonas aeruginosa*.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Global Brass and Copper Inc.: 427 North Shamrock St., East Alton, IL 62024	EPA Registration Number/File Symbol 85353-XX
Active Ingredient(s) and/or representative test compound(s) Copper (metallic)	Date October 22, 2008
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Indoor, non-food	Product Name Copper Shield 82

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

<input type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	<input checked="" type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).
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SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

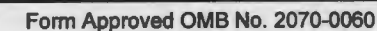
I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature 	Date 10/22/2008	Typed or Printed Name and Title Heather R. Bjornson, Regulatory Consultant
---------------	--------------------	---



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

Date October 22, 2008

EPA Reg No./File Symbol 85353-XX

Page 1 of 5

Applicant's/Registrant's Name & Address

Global Brass and Copper Inc. 427 North Shamrock Street, East Alton, IL 62024

Copper Shield 82

Ingredient	Copper (Metallic)
------------	-------------------

Signature _____

Signature: Stephen R. Boser

[illegible]

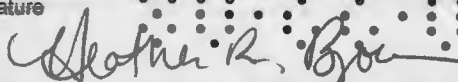
Heather R. Bjornson, Regulatory Affairs



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WASHINGTON, D.C. 20460

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DATA MATRIX

Date October 22, 2008		EPA Reg No./File Symbol 85353-XX		Page 2 of 5	
Applicant's/Registrant's Name & Address Global Brass and Copper Inc. 427 North Shamrock Street, East Alton, IL 62024		Copper Shield 82			
Ingredient Copper (Metallic)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6302	Color				Not required OPPTS 830.1000
830.6303	Physical State	47160801	Copper Development Association	PER	
830.6304	Odor				Not required OPPTS 830.1000
830.6313	Stability to Temperature, Metals, and Metal Ions				Not required OPPTS 830.1000
830.6314	Oxidation/Reduction	47160801	Copper Development Association	PER	
830.6315	Flammability	47160801	Copper Development Association	PER	
830.6316	Explosibility	47160801	Copper Development Association	PER	
830.6317	Storage Stability	47160801	Copper Development Association	PER	
830.6319	Miscibility	47160801	Copper Development Association	PER	
830.6320	Corrosion Characteristics	47160801	Copper Development Association	PER	
830.6321	Dielectric Breakdown Voltage	47160801	Copper Development Association	PER	
830.7000	pH	47160801	Copper Development Association	PER	
830.7050	UV/Visible Absorption				Not required OPPTS 830.1000
830.7100	Viscosity	47160801	Copper Development Association	PER	
Signature 			Name and Title Heather R. Bjornson, Regulatory Agent		Date 10/22/2008



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

Date October 22, 2008 EPA Reg No./File Symbol 85353-XX Page 4 of 5

Applicant's/Registrant's Name & Address

Global Brass and Copper Inc. 427 North Shamrock Street, East Alton, IL 62024

Copper Shield 82

Ingredient Copper (Metallic)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.1100	Acute Oral Toxicity - Rats	46999302	Copper Development Association	PER	
870.1100	Acute Oral Toxicity - Mice	46999302	Copper Development Association	PER	
870.1200	Acute Dermal Toxicity	46999302	Copper Development Association	PER	
870.1300	Acute Inhalation Toxicity	46999302	Copper Development Association	PER	
870.2400	Acute Eye Irritation	46999302	Copper Development Association	PER	
870.2500	Acute Dermal Irritation	46999302	Copper Development Association	PER	
870.2600	Skin Sensitization	46999302	Copper Development Association	PER	
870.3150	90-Day Oral Toxicity - Dogs	46999302	Copper Development Association	PER	
870.3465	90-Day Oral Toxicity - Rats	46999302	Copper Development Association	PER	
870.3700	Prenatal Developmental Toxicity - Rabbits	46999302	Copper Development Association	PER	
870.3700	Prenatal Developmental Toxicity - Rats	46999302	Copper Development Association	PER	
870.3800	Reproduction and Fertility Effects - 2 Gen	46999302	Copper Development Association	PER	
870.4100	Chronic Feeding, Dog	46999302	Copper Development Association	PER	
870.4100	Chronic Feeding, Rat	46999302	Copper Development Association	PER	
870.5100	Bacterial Reverse Mutation (Ames) Test	46999302	Copper Development Association	PER	
870.5100	Other Mutagenicity	46999302	Copper Development Association	PER	
870.7485	Metabolism and Pharmacokinetics - Rat	46999302	Copper Development Association	PER	

Signature

Name and Title

Heather R. Bjornson, Regulatory Agent

Date

10/22/2008




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

DATA MATRIX

Page 1 of 5

Copper Shield 82

Ingredient Copper (Metallic)

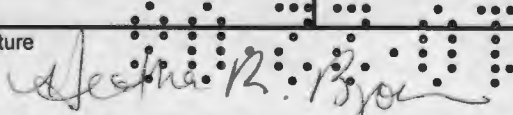
Signature 	Name and Title Heather R. Bjornson, Regulatory Agent	Date 10/22/2008
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DATA MATRIX

Date October 22, 2008		EPA Reg No./File Symbol 85353-XX		Page 2 of 5	
Applicant's/Registrant's Name & Address Global Brass and Copper Inc. 427 North Shamrock Street, East Alton, IL 62024		Copper Shield 82			
Ingredient Copper (Metallic)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
					Not required OPPTS 830.1000
			Copper Development Association	PER	
					Not required OPPTS 830.1000
					Not required OPPTS 830.1000
			Copper Development Association	PER	
			Copper Development Association	PER	
			Copper Development Association	PER	
			Copper Development Association	PER	
			Copper Development Association	PER	
			Copper Development Association	PER	
			Copper Development Association	PER	
			Copper Development Association	PER	
					Not required OPPTS 830.1000
			Copper Development Association	PER	
Signature 		Name and Title Heather R. Bjornson, Regulatory Agent		Date 10/22/2008	



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DATA MATRIX

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Date **October 22, 2008**

EPA Reg No./File Symbol 85353-XX

Page 4 of 5

Applicant's/Registrant's Name & Address

Global Brass and Copper Inc. 427 North Shamrock Street, East Alton, IL 62024

Copper Shield 82

Ingredient	Copper (Metallic)
------------	-------------------

[illegible]

Signature _____

Heather R. Boz

Name and Title

Heather R. Bjornson, Regulatory Agent

Date _____

10/22/2008



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401 M Street, S.W.
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Date October 22, 2008

EPA Reg No./File Symbol 85353-XX

Page 5 of 5

Applicant's/Registrant's Name & Address

Global Brass and Copper Inc. 427 North Shamrock Street, East Alton, IL 62024

Copper Shield 82

Ingredient	Copper (Metallic)
------------	-------------------

[illegible]

GLOBAL

Brass and Copper, Inc.

GBC Metals, LLC
doing business as

Olin BRASS

A. J. Oster, LLC



Chase Brass, LLC



August 20, 2008

Document Processing Desk (COADR)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

**RE: Global Brass and Copper, Inc (EPA Company Number 85353)
Letter of Authorization**

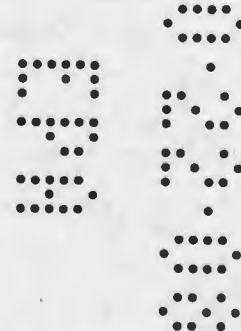
Global Brass and Copper, Inc has an agreement with Technology Sciences Group Inc. (TSG) to provide regulatory assistance regarding the registration of pesticide products. With this letter we confirm TSG as an authorized agent in all matters concerning the registration of pesticide products with the Agency. This letter constitutes authorization for the Office of Pesticide Programs to discuss the status of these registrations and supporting data with representatives of TSG, including disclosure of trade secret information, and acknowledges that official correspondence from the Office of Pesticide Programs can be directed to the agent. The full name and mailing address of the agent is as follows:

Heather R. Bjornson
Technology Sciences Group, Inc.
1150 18th Street, N.W.
Suite 1000
Washington, D.C. 20036
Tel. (202) 828-8945
Fax (202) 872-0745
Email: hbjornson@tsgusa.com

If there are any questions or comments please contact John Gerfen, Manager, Market Dev...
Engineering, 618-258-5272 phone, 618-258-5772 fax.

Sincerely,

John Gerfen
Manager, Market Dev. Engineering
618-258-5272
618-258-5772 fax





WASHINGTON

1150 18th Street, N.W.

Suite 1000

Washington, D.C. 20036

Telephone 202 223-4392

Fax 202 872-0745

Marshall Swindell, PM 33
Antimicrobial Division
Office of Pesticide Programs, EPA
One Potomac Yard,
2777 South Crystal Drive
Arlington, VA 22202

October 22, 2008

RE: Copper Shield 82

PRIA II Category: A530 – New product, identical or substantially similar to a registered product

SACRAMENTO

712 Fifth Street

Suite A

Davis, CA 95616

Telephone 530 757-1298

Fax 530 757-1299

Dear Mr. Swindell:

Technology Sciences Group, Inc., on behalf of Global Brass and Copper Inc., is submitting the enclosed application to register, Copper Shield 82. Copper Shield 82 is identical to EPA Reg. No. 82012-3, Antimicrobial Copper Alloys Group Three. Global Brass and Copper Inc., is a supporting member of the Antimicrobial Copper Alloys Stewardship Plan as well as the Copper Development Association (confirmation submitted herein) and has authorization from CDA to cite their data to support Copper Shield 82's application for registration.

You will find the following enclosed with this application for registration:

- 1) Application form,
- 2) Confidential Statement of Formula,
- 3) Certification with respect to data citation,
- 4) Data matrices for the end-use product (confidential and non-confidential versions),
- 5) 5 copies of the proposed labeling,
- 6) Letter authorizing TSG to act on behalf of Global Brass and Copper Inc.,
- 7) Letter from CDA authorizing data access to support Global Brass and Copper,
- 8) Copper Alloys Stewardship Plan agreement, and
- 9) Pay.gov receipt for pre-payment of the PRIA fee (pay.gov Tracking ID: 24V1VT27; Agency Tracking ID: 74056725576).

CANADA

275 Slater Street

Suite 900

Ottawa, Ontario

K1P 5H9

Telephone 613 247-6285

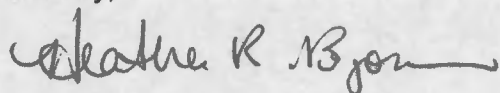
Fax 613 236-3754

E-mail tsg@tsgusa.com

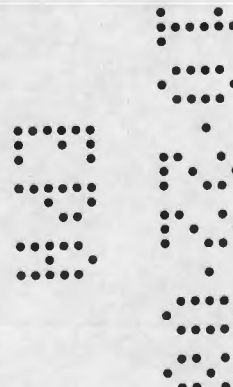
<http://www.tsgusa.com>

Please do not hesitate to contact me with any questions regarding this application via telephone (202) 828-8945 or via e-mail: hbjornson@tsgusa.com.

Sincerely,

A handwritten signature in dark ink, appearing to read "Heather R. Bjornson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Heather R. Bjornson
Regulatory Consultant to Global Brass and Copper, Inc.





United States
Environmental Protection Agency
Washington, DC 20460

☒ Registration
☐ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 85353-XX <i>G</i>	2. EPA Product Manager Marshall Swindell	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Copper Shield 82	PM# 33	
5. Name and Address of Applicant (Include ZIP Code) Global Brass and Copper Inc. 427 North Shamrock Street East Alton, IL 62024 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. <u>82012-3</u> Product Name <u>Antimicrobial Copper Alloys Group 3</u>	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input checked="" type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

PRIA Category: A530 - New product, me-too, fast-track. Please confirm with Heather Bjornson via e-mail: hbjornson@tsgusa.com

Pay.gov pre-payment: pay.gov Tracking ID: 24V1VT27; Agency Tracking ID: 74056725576

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input checked="" type="checkbox"/> Other (Specify) <u>none</u>	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container NA- no container		5. Location of Label Directions <input checked="" type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input checked="" type="checkbox"/> Other Attached to Bill of Lading			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Heather R. Bjornson	Title Regulatory Consultant	Telephone No. (Include Area Code) (202) 828-8945	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment of both under applicable law.			6. Date Application Received (Stamped)
2. Signature <i>Heather R. Bjornson</i>	3. Title Regulatory Consultant to Global Brass and Copper Inc.		
4. Typed Name Heather R. Bjornson	5. Date October 22, 2008		



Copper Development Association Inc.

September 30, 2008

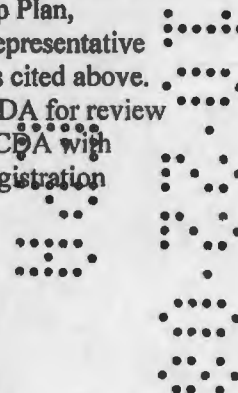
Global Brass and Copper, Inc.
427 N. Shamrock Street
East Alton, IL 62024-1197
Attn: John Gerfen

Re: Commitment to Support Antimicrobial Copper Alloys Stewardship Plan

Dear Global Brass and Copper, Inc.

By this letter, the Copper Development Association ("CDA") confirms that Global Brass and Copper, Inc. is a member in good standing of CDA. As a CDA member, Global Brass and Copper, Inc. has agreed and committed to support the Stewardship Plan and satisfy all other conditions for registration of Antimicrobial Copper Alloys (EPA Reg. No. 82012-1 through 5 inclusive). Global Brass and Copper, Inc. may rely on the CDA's efforts with regard to the Stewardship plan. CDA will inform the Agency immediately should Global Brass and Copper, Inc. not be entitled at anytime in the future to rely on CDA's Stewardship Plan efforts. The U.S. Environmental Protection Agency ("EPA") has requested that CDA members submit a copy of this letter with applications for registration of their own antimicrobial copper alloys.

By signing this letter at the place indicated below, returning a copy to CDA, and submitting the original signed letter to EPA, Global Brass and Copper, Inc. agrees and certifies that it will abide by and support the CDA Stewardship Plan for Antimicrobial Copper Alloys as well as comply with each of the conditions of registration set forth in EPA Reg. Nos. 82012-1 through 5 (inclusive). This commitment includes compliance with and support for the outreach activities, website, and working group as specified in the Stewardship Plan as well as compliance with all conditions of the above-referenced registrations. Global Brass and Copper, Inc. also agrees to sell and distribute EPA-registered antimicrobial alloys in compliance with all requirements of applicable statutes and regulations and all requirements of the registration and the Stewardship Plan, including, but not limited to, cooperating with CDA in the submission of representative advertising materials to EPA as detailed in condition #2 of the registrations cited above. All advertising materials submitted by Global Brass and Copper, Inc. to CDA for review or transmittal to EPA will be kept confidential by CDA and not shared by CDA with other CDA members or third parties (other than EPA, as required by the registration conditions).



If you have any questions regarding this letter please contact me.

Sincerely,

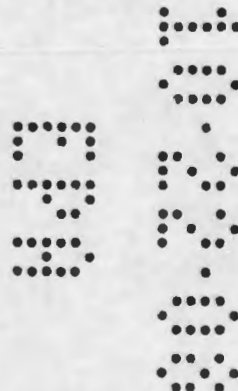
Harold T. Michels

Harold T. Michels, Ph.D, P.E.
Senior Vice President, Technology & Technical Services
Copper Development Association
260 Madison Avenue
New York, NY 10016
Tel: 212-251-7224
hmichels@cda.copper.org

The undersigned hereby certifies that
it will comply with and support the
CDA Stewardship Plan and other
conditions of registration for
Antimicrobial Copper Alloys.

Thomas G. Baker

Name: *Thomas G. Baker*
Title: *V.P. Marketing & Sales*
Company: *Olik Brass*





Copper Development Association Inc.

September 24, 2008

Director, Antimicrobial Division
Office of Pesticide Programs
U.S. Environmental Protection Agency
One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

Subject: Copper Development Association
Letter of Access to Data
Global Brass and Copper, Inc., EPA Company Number 85353

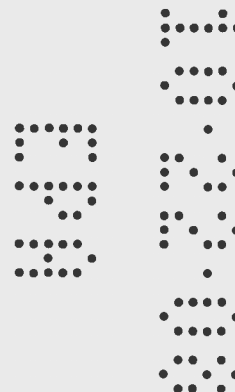
Dear Director:

The Copper Development Association ("CDA") hereby authorizes EPA to rely upon data submitted by CDA regarding antimicrobial copper alloys, EPA Reg. Nos. 82012-1 through 5, in support of applications submitted by Global Brass and Copper, Inc. Global Brass and Copper, Inc. is a member of CDA and therefore eligible to have EPA rely upon the CDA data. This authorization extends only to the use of the data but not the release of copies of the study reports, either in paper or electronic copy.

If you have any questions regarding this authorization, please contact me.

Sincerely,

Harold Michels, Ph.D, P.E.
Senior Vice President, Technology & Technical Services
Copper Development Association
260 Madison Avenue
New York, NY 10016
Tel: 212-251-7224
hmichels@cda.copper.org



Online Payment

Step 3: Confirm Payment

1 | 2 | 3

Thank you.

Your transaction has been successfully completed.

Pay.gov Tracking Information

Application Name: PRIA Service Fees

Pay.gov Tracking ID: 24V1VT27

Agency Tracking ID: 74056725576

Transaction Date and Time: 10/21/2008 20:11 EDT

Payment Summary

Address Information	Account Information	Payment Information
Account Holder Heather R. Name: Bjornson 1150 18th St. Billing Address: NW Billing Address 2: Ste. 1000 City: Washington State / Province: DC Zip / Postal Code: 20036 Country: USA	American Card Type: Express Card Number: *****1436 Expiration Date: 4 / 2011 Decision Number: Registration Number: 85353-G	Payment Amount: \$1,050.00 Transaction Date 10/21/2008 and Time: 20:11 EDT

